



CODE OF BUSINESS ETHICS AND CONDUCT

Paradigm Professional Health Services, Inc.

January 2019

CODE OF BUSINESS ETHICS AND CONDUCT

Paradigm Professional Health Services

The success of Paradigm Professional Health Services (Paradigm) is dependent on the trust and confidence we earn from our employees and Clients. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*.

Paradigm Professional Health Services' Code of Business Ethics & Conduct (Code of Conduct) covers many areas and sets forth standards and behaviors by which we conduct business. It applies to all Paradigm Professional Health Services employees, setting a clear expectation that the standards be followed always in job-related activities. The Code of Conduct is not a substitute for good judgment nor will it cover every situation a Paradigm Professional Health Services employee may encounter. More detailed information regarding Paradigm Professional Health Services' Code of Conduct are outlined below. If an employee has any questions about this Code of Conduct, contact HR@p2healthservices.com for additional details.

Unacceptable workplace behavior is inconsistent with the behavior described in the Code of Conduct. Behavior, which would be considered unacceptable at Paradigm Professional Health Services, includes, but is not limited to, the following:

- Stealing and misuse of time and resources – includes not only misusing physical company assets but “stealing time” from Paradigm Professional Health Services such as aimless internet surfing, extending breaks beyond the allotted time, engaging in lengthy gossip sessions during working time, falsifying timesheets, and coming to work late or leaving early
- Bullying – progressive and systematic negative antisocial behavior, which includes verbal and physical abuse, consistent attempt to belittle others, lack of respect for authority, social exclusion and spreading of rumors
- Denouncing company policies – includes badmouthing Paradigm Professional Health Services or Clients' policies to coworkers, clients and the public verbally or through other means such as social networking sites
- Social loafing – includes reducing one's individual efforts and work outputs when working in teams
- Inappropriate verbal and physical actions – such as using profanity, making insulting comments, yelling, teasing, name calling or ridicule or making someone the brunt of pranks or practical jokes, making offensive gestures, and viewing inappropriate images or pornography in hard copy or electronically
- Dressing inappropriately
- Undermining the performance, reputation or professionalism of others – by deliberately withholding information, resources or authorization or supplying incorrect information

Absenteeism and Tardiness

Absences and and/or tardiness are disruptive, expensive, and can place an unfair burden on Paradigm Professional Health Services and its Clients. To that end, employees are expected to report to work on time and on a regular basis. If an employee knows he/she will be unable to work for all or a part of their scheduled shift, the employee must notify Paradigm Professional Health Services' staffing manager and the Client in writing as soon as possible by email but not later than two hours before his/her scheduled shift is to start. An absent employee must notify

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Paradigm Professional Health Services' manager and the Client each day of the absence indicating his/her availability to return to work.

Proprietary and Confidential Information

Paradigm Professional Health Services property and Client property includes not only tangible property such as desks and computers, but also intangible property such as information. Of importance are proprietary information and confidential information.

“Proprietary Information” includes all information relating in any manner to the business of Paradigm Professional Health Services and its affiliates, clients, consultants, and business associates, which is obtained by Paradigm Professional Health Services employees during their work. This handbook, for example, contains proprietary information.

“Confidential Information” includes any Paradigm Professional Health Services or Client information, which is unknown generally to the public or to the industry. This includes, but is not limited to the following:

- Computer programs, including source code and flow charts;
- Names, buying habits, and practices of Paradigm Professional Health Services' Clients, vendors and/or suppliers;
- Customer lists, customer files, personnel files, computer records, financial and marketing data, formulas, and trade secrets;
- Training methods, marketing strategies, sales techniques, new products or new uses for old products, contracts, licenses, and business systems;
- Financial information including costs of materials, the prices for which Paradigm Professional Health Services buys or sells its products or services, compensation paid to employees and other terms of employment;
- Scientific studies or analyses; or
- Confidential information of, about, or concerning the business of Paradigm Professional Health Services or any Client, and their manner of operation.

Protecting proprietary information and confidential information is of vital concern to Paradigm Professional Health Services. Employees may not disclose or use proprietary information or confidential information except as their jobs require. This obligation remains even after an employee's employment relationship with Paradigm Professional Health Services ends. Anyone who violates this guideline will be subject to discipline and possible legal recourse.

Security

To avoid loss of Paradigm Professional Health Services property, each Paradigm Professional Health Services office maintains rules and procedures for maintaining control of entrances, exits, restricted areas, document control, and recordkeeping. Employees are to abide by these rules and procedures and must observe good security practices.

Employees are responsible for keeping proprietary information and confidential information secure from outside visitors and all other persons who do not have a legitimate reason to see or use such information.

Failure to adhere to Paradigm Professional Health Services policies regarding proprietary

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information and confidential information constitute grounds for discipline, up to and including dismissal.

Human Trafficking

Paradigm Professional Health Services' Code of Conduct establishes respect for others as a fundamental Paradigm Professional Health Services principle, and one that Paradigm Professional Health Services employees are expected to honor. To that end, Paradigm Professional Health Services and its employees shall not, while in the performance of government contracts,

- Engage in trafficking in persons;
- Procure commercial sex acts; or
- Use forced labor in the performance of government contracts.

Failure to adhere to this policy regarding human trafficking constitutes grounds for discipline, up to and including dismissal.

Obligations on Reassignment or Termination

Prior to reassignment or termination (voluntary or involuntary), employees return all Paradigm Professional Health Services and Client documents, computer records, and other tangible Paradigm Professional Health Services and Client property in their possession or control before a new assignment can be issued.

CONFLICTS OF INTEREST

Employees are expected to use good judgment, to adhere to high ethical standards, and to avoid situations that create an actual or potential conflict between the employee's personal interests and the interests of Paradigm Professional Health Services or Client. A conflict of interest exists when the employee's loyalties or actions are divided between Paradigm Professional Health Services' or Client's interests and those of another, such as a competitor, supplier, or customer. Both the fact and the appearance of a conflict of interest should be avoided. Employees unsure as to whether a certain transaction, activity, or relationship constitutes a conflict of interest are encouraged to discuss it with either their Paradigm manager or Paradigm's HR department at HR@p2healthservices.com.

Non-disclosure of actual or potential conflict or apparent conflict of interest may result in termination of a contract, suspension or debarment from contracting with the federal government, and/or imprisonment and fines. Any outside activities related to these conditions should be fully disclosed before the activity is undertaken. If known by the employee, the same information must be disclosed for immediate family members or relatives. Disclosure is required for the following:

- Investing in any supplier, customer or competitor under the following conditions:
 - Financial interest in any supplier, customer or competitor where the Paradigm Professional Health Services employee has influence on contracts, processes, products of the supplier or Paradigm Professional Health Services business decisions with respect to that entity.
 - Financial interest in any supplier, customer or competitor if the holding is either five percent (5%) or more of the stock, assets or other interests of the supplier, customer or competitor; or ten percent (10%) or more of the employee's net assets. (This does not

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- pertain to the administration of Paradigm Professional Health Services' 401K plan.)
- Acting as an employee, officer, director, partner, consultant, representative, agent, auditor or advisor, of any of the following:
 - A supplier, customer, partner, subcontractor, or competitor of Paradigm Professional Health Services or Client.
 - Any business that is involved in technical areas or product lines that are similar to those of Paradigm Professional Health Services.
 - Any business whose customers include Paradigm Professional Health Services, its Clients, its customers, or its suppliers.
 - Acting as a consultant, advisor, or expert witness in a legal process, such as a lawsuit, administrative proceeding, mediation, arbitration, dispute resolution, government or private investigation, rule-making procedure, or similar process except for participating in a background check for a security clearance for a current or former employee(s).
 - Engaging in any activity that could create the appearance of a conflict of interest, and thereby impair the reputation of Paradigm Professional Health Services for impartiality and fair dealing. Examples of such activities include:
 - Having any financial involvement with an employee or representative of a supplier, vendor, customer, partner, subcontractor, or competitor of Paradigm Professional Health Services with whom the employee regularly comes in contact while performing company business.
 - Participating in any activity that might lead to or give the appearance of unapproved disclosures of Paradigm Professional Health Services proprietary information or proprietary information owned by others who have entrusted such information to Paradigm Professional Health Services.
 - Dealing directly, in the course of normal company responsibilities, with a spouse or immediate family member or relative who is employed by a supplier, vendor, customer, or competitor of Paradigm Professional Health Services.
 - Operating as a supplier to Paradigm Professional Health Services.

A full description of the actual or potential conflict or apparent conflict of interest should be provided by the Paradigm Professional Health Services employee and should include the following:

- Type of actual or potential conflict or apparent conflict of interest.
- A description of the employee's Paradigm Professional Health Services duties and responsibilities and how they might relate to the outside activity.
- A general description of the current or proposed outside company or business, including the company name, product lines, and market.
- A description of the relationship of the outside company or business to Paradigm Professional Health Services, if any (for example, supplier, customer, similar products or customers, competitor).
- The position to be held by the employee or their immediate family member or relative (e.g., owner, co-owner, employee, representative, consultant, etc.) and their intended level of effort.

Based on contract requirements, Paradigm Professional Health Services employees may be required to fully disclose any actual or potential conflict or apparent conflict of interest through the Conflict of Interest Disclosure Form.

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Conflicts of Interest and Government Contracts

General Responsibilities

- All employees are expected to understand and adhere to the highest standards of ethical business conduct and to understand and comply with the rules established by our customers for procuring products and services. Paradigm Professional Health Services employees may not engage in inappropriate conduct that is outlined in this policy through associate contractors, suppliers, consultants, or any other means. Employees may not ask or permit others to do anything that they are not permitted to do themselves.
- Employees who deal with the U.S. Government must understand the rules the U.S. Government has established for its own representatives. Employees must not attempt to induce U.S. Government personnel to do anything they are prohibited from doing or to engage in any activity that could create a perception of improper business conduct.
- Employees must not offer gifts, favors or services to any U.S. Government customer or potential customer.
- Employees must deal with U.S. Government representatives in an atmosphere of openness. Whenever possible, meetings should be scheduled in normal business locations and at normal business hours under circumstances that could not be interpreted to imply concealment.
- Any document prepared by or on behalf of Paradigm Professional Health Services and provided to U.S. Government representatives should clearly indicate that it was prepared by Paradigm Professional Health Services and include an appropriate legend if the document contains Paradigm Professional Health Services proprietary information, whether technical or financial in nature. Under no circumstances should such a document purport to be an internal U.S. Government document or the work product of someone else.
- Exchange of information between the U.S. Government and Paradigm Professional Health Services and between Paradigm Professional Health Services and another company may be appropriate if receipt or exchange of such information does not violate laws, regulations, agreements or Paradigm Professional Health Services policies and procedures. Unauthorized possession or use by Paradigm Professional Health Services of U.S. Government or competitor data or information may be construed as giving Paradigm Professional Health Services an unfair competitive advantage and could be the basis for a bid protest, debarment, or civil or criminal charges against Paradigm Professional Health Services and the individual employees involved. Accordingly, information may properly be received (whether orally, in writing, or electronically) only from authorized sources and when there is no doubt as to the company's or the employee's right to receive and possess such information. If there is any doubt, an employee's immediate manager or the president of Paradigm Professional Health Services should be contacted before proceeding.
- Information that is proprietary to Paradigm Professional Health Services should not be provided to another company, and another company's proprietary information should not be sought or accepted by Paradigm Professional Health Services, unless the parties have entered into an appropriate Non-Disclosure Agreement addressing the use and protection of the proprietary information.
- Paradigm Professional Health Services encourages a full and open dialogue with U.S. Government customers subject to the awareness that particular care should be taken to avoid even the appearance of a conflict of interest or other impropriety, particularly as procurement activity approaches the competition stage. Conflicts occur when the degree of access to U.S.

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Government information or participation in the development of a requirement reaches a level that places a contractor at an unfair competitive advantage in bidding a procurement opportunity. Such conflicts could result in bid disqualifications and possible civil or criminal action against the company and/or involved employees.

- In addition to compliance with laws and regulations, employees will conduct themselves in such a way that the company's integrity is not questioned. The appearance of impropriety must be avoided, and care must be taken to ensure that actions that may otherwise be proper do not lead to misunderstandings detrimental to the company's reputation and chances of winning a procurement opportunity.

Marketing the U.S. Government

Private industry is an important source of information to the U.S. Government on future products that could satisfy U.S. Government needs. Exchange of information about those needs and the means of satisfying them are therefore in the national interest. Paradigm Professional Health Services employees may participate in this process and, if pursued in accordance with authorized procedures, promote solutions based on Paradigm Professional Health Services product lines and skills.

- The following marketing activities are acceptable:
 - Inquiring through authorized channels about U.S. Government requirements.
 - Recommending ways of satisfying U.S. Government requirements based on Paradigm Professional Health Services products and capabilities.
 - Commenting factually about solutions advanced by others if properly requested by U.S. Government personnel.
- The following marketing activities are unacceptable:
 - Requesting or receiving information from U.S. Government personnel that they are prohibited from providing by virtue of law or their own regulations.
 - Offering business courtesies.
 - Engaging in marketing activities that could be perceived by others as improper business conduct.
 - Seeking, obtaining, or using U.S. Government or competitor information or documents that Paradigm Professional Health Services is not authorized to possess, or obtaining U.S. Government or competitor information or documents other than through authorized channels and with appropriate documentation.

Activities after a Contract Has Been Awarded

Derogatory comments about contract awards to competitors should not be made. Propriety and impartiality in U.S. Government source selection should be assumed. If any employee has reason to believe that a conflict of interest or other improper activity may have affected the outcome of a source selection, or that material facts may not have been considered, the matter should be reported to HR@p2healthservices.com.

Activities during Contract Performance

It is essential that Paradigm Professional Health Services preserve its reputation for honoring contractual commitments. It is expected that all employees who are responsible for contract

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performance will conduct themselves accordingly. Legitimate differences of opinion may arise about contractual terms and performance. If this happens, Paradigm Professional Health Services employees should contact HR@p2healthservices.com.

EQUAL EMPLOYMENT OPPORTUNITY

Paradigm Professional Health Services provides equal opportunity for all applicants and employees. Paradigm Professional Health Services does not unlawfully discriminate on the basis of race, color, religion, sex (including pregnancy, childbirth and related conditions), gender identity, gender expression, age, national origin, ancestry, or physical or mental disability, legally protected medical condition or information, genetic information, family care status, veteran status, domestic partner status, sexual orientation, or any other basis protected by local, state, or federal laws. When necessary, Paradigm makes reasonable accommodations for disabled employees and for pregnant employees who request an accommodation, with the advice of their health care providers, for pregnancy, childbirth, or related medical conditions. This policy also applies to disabled veterans and veterans of the Vietnam era. In addition, all other personnel matters, such as compensation, benefits, layoffs, training, and education shall be administered without unlawful discrimination of any kind.

Paradigm Professional Health Services understands and reviews its Affirmative Action Compliance Program (AACP) annually and is committed to making good faith efforts towards achieving the objectives of the AACP.

All employment decisions are based on objective standards and the furtherance of equal employment opportunity. Employees are encouraged to discuss any questions or concerns about equal employment opportunities with either Paradigm's manager or HR@p2healthservices.com.

AGE DISCRIMINATION

It is the policy of Paradigm Professional Health Services to comply with the Age Discrimination Act of 1967 (ADEA), which prohibits an employer from discriminating in employment, based on age, against persons 40 or older.

HARASSMENT PREVENTION

Paradigm Professional Health Services affirms its commitment to ensuring an environment for all employees, which is fair, humane, and respectful. It is Paradigm Professional Health Services' policy to comply with Title VII of the Civil Rights Act of 1964 and the EEOC Guidelines of 1980 and applicable state laws, which state that harassment is an unlawful practice. It is also Paradigm's policy to provide harassment prevention training every two years, which meets applicable legal requirements mandated by local and federal laws.

Paradigm Professional Health Services does not tolerate discrimination or harassment based on gender sex (including pregnancy, childbirth or related medical conditions), gender identity, gender expression, race, color, religion, national origin, ancestry, age, physical disability, mental disability, legally protected medical condition or information, genetic information, family care status, marital status, domestic partner status, sexual orientation, veteran status, military caregiver

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status, or any other status protected by state and federal laws.

Harassment

Paradigm Professional Health Services is committed to providing a workplace free of unlawful harassment. This includes sexual harassment (which includes harassment based on gender, gender identity, pregnancy, childbirth, or related medical conditions), as well as harassment based on such factors as race, color, creed, religion, national origin, citizenship, ancestry, age, physical disability, mental disability, medical condition, marital status, sexual orientation, domestic partner status, family care or medical leave statutes, veteran status, or any other basis protected by federal, state, or local laws.

It is illegal and against the policies of Paradigm Professional Health Services for any employee, male or female, to unlawfully harass another employee, client, or vendor on any of the bases listed above. Paradigm Professional Health Services strongly disapproves of and will not tolerate harassment of employees by managers, supervisors, or co-workers. Similarly, Paradigm Professional Health Services will not tolerate harassment by its employees of non-employees with whom Paradigm Professional Health Services employees have a business, service, or professional relationship. Paradigm will also attempt to protect employees from harassment by non-employees in the workplace.

Harassment includes verbal, physical, and visual conduct that creates an intimidating, offensive, or hostile working environment or that interferes with an employee's work performance. Such conduct constitutes harassment when (1) submission to the conduct is made either an explicit or implicit condition of employment; (2) submission or rejection of the conduct is used as the basis for an employment decision; or (3) the harassment interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment.

Harassing conduct can take many forms, and may include, but is not limited to, the following (when based on an employee's protected status as noted above): derogatory comments, slurs, jokes, nicknames, assault, impeding or blocking another's movement or otherwise physically interfering with normal work, pictures, drawings, or cartoons, violating someone's "personal space," foul or obscene language, leering, stalking, staring, unwanted or offensive letters or poems, offensive email or voicemail messages, or non-verbal innuendo that relates to or reflects negatively upon any protected group.

Sexual Harassment

It is illegal and against the policies of Paradigm Professional Health Services for any employee, male or female, to sexually harass another employee by:

- Making unwelcome sexual advances or requests for sexual favors a condition for an employee's continued employment;
- Any verbal or physical conduct of a sexual nature;
- Making submission to or rejections of such conduct as the basis for employment decisions affecting the employee; or
- Creating an intimidating, hostile, or offensive working environment by such conduct.

Sexually harassing conduct can be by a person of either the same or opposite sex.

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Paradigm Professional Health Services understands that victims of harassment are often embarrassed and reluctant to report acts of harassment for fear of being blamed, concern about being retaliated against, or because it is difficult to discuss sexual matters openly with others. However, no employee should have to endure harassing conduct, and Paradigm Professional Health Services therefore encourages employees to promptly report any incidents of harassment so that corrective action may be taken.

Any employee who believes that the actions or words of a manager, fellow employee, client, or vendor, constitute any form of unlawful harassment has a responsibility to report the situation immediately to Mariahm Stephenson, the Manager at Paradigm Professional Health Services Human Resource office at (503) 906-7928manager, or to HR@p2healthservices.com so that an investigation may be initiated.

Every reported complaint of harassment will be investigated thoroughly and promptly. The Human Resources representative or manager responsible for the investigation will notify the employee who lodged the harassment complaint of the results of the investigation. The investigation will be handled in as confidential a manner as possible consistent with a full, fair, and proper investigation.

To the extent possible, Paradigm Professional Health Services will maintain the confidentiality of the reporting employee and of the investigation. Paradigm Professional Health Services will disclose information only to those who need such information to investigate and/or take corrective action.

Paradigm Professional Health Services will not tolerate retaliation against any employee who makes a good faith complaint of workplace harassment or for cooperating in an investigation.

Any manager who receives a report of harassment must immediately contact Mariahm Stephenson the Manager at Paradigm Professional Health Services Human Resources office at (503) 906-7928, or to HR@p2healthservices.com so that an investigation may be initiated. All reports of harassment will be taken seriously and an investigation will be conducted to determine what steps are necessary. If Paradigm Professional Health Services determines that unlawful harassment or retaliation has occurred, Paradigm Professional Health Services will take appropriate corrective action and will impose discipline on offending employees. The appropriate corrective action/discipline will depend on the particular facts but may include training, referral to counseling, written or oral warnings, probation, and/or reassignment of responsibilities, suspension, or termination. If the harassing behavior is that of a non-employee, Paradigm Professional Health Services will take appropriate corrective action to ensure that such behavior is not repeated.

Anti-Harassment Training

Every Paradigm Professional Health Services employee is required to undergo harassment prevention training once every two years, which meets applicable legal requirements mandated by local and federal laws. An employee who fails to comply with this section may be subject to

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disciplinary action, up to and including termination of employment.

DRUG-FREE WORKPLACE GUIDELINE

It is the intent of Paradigm Professional Health Services to maintain a workplace that is free of drugs and alcohol and to discourage drug and alcohol abuse by Paradigm Professional Health Services employees. Paradigm Professional Health Services has a vital interest in maintaining safe and efficient working conditions for Paradigm Professional Health Services employees.

Paradigm Professional Health Services has established this Guideline concerning the use of alcohol and drugs to further its interest in avoiding accidents, to promote and maintain safe and efficient working conditions for its employees, and to protect its and its clients' business, property, and operations. Employees must abide by this Guideline as a condition of continued employment with Paradigm Professional Health Services.

All employees are required by this Guideline to notify Paradigm Professional Health Services of any conviction under a criminal drug statute for a violation occurring in the workplace or during any Paradigm Professional Health Services-related activity or event not later than five days after an employee's conviction. When required by federal law, Paradigm Professional Health Services will notify any federal agency with which it has a contract, of any employee convicted under a criminal drug statute for a violation occurring in the workplace.

Definitions

For purposes of this Guideline:

- “Illegal drugs or other controlled substances” means any drug or substance that:
 - Is not legally obtainable; or
 - Is legally obtainable but has not been legally obtained; or
 - Has been legally obtained but is being sold or distributed unlawfully.
- “Legal drugs” means any drug, including prescription drugs and over-the-counter drugs, that has been legally obtained and that is not unlawfully sold or distributed.
- “Abuse of any legal drug” means the use of any legal drug:
 - For any purpose other than the purpose for which it was prescribed or manufactured; or
 - In a quantity, frequency, or manner that is contrary to the instructions or recommendations of the prescribing physician or manufacturer.
- “Reasonable suspicion” includes a suspicion that is based on specific personal observations such as an employee's manner, disposition, muscular movement, appearance, behavior, speech or breath odor; information provided to management by an employee, by law enforcement officials, by a security service, or by other persons believed to be reliable; or a suspicion that is based on other surrounding circumstances.
- “Possession” means that an employee has the substance on his or her person or otherwise under his or her control.
- “Controlled Substance” means any substance listed in Schedules I-V of Section 202 of the Controlled Substance Act, 2 U.S.C. § 812, as further defined in the corresponding regulations at 21 C.F.R. §§ 1308.11-1308.15.
- “Conviction” means finding guilt, including a plea of “nolo contendere” (no contest), or imposition of sentence, or both, by any judicial body charged with the responsibility to

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determine violations of the federal or state criminal drug statutes.

- “Criminal Drug Statute” means a federal or non-federal criminal statute involving the manufacture, distribution, dispensing, possession, or use of any controlled substance.
- “Workplace” means Paradigm Professional Health Services premises and any other location where Paradigm Professional Health Services employees perform their jobs.
- “Under the influence” is defined as being unable to perform work safely and productively and being in a physical or mental condition that risks the safety and well-being of the individual, other employees, the public, or company property.

Prohibited Conduct

The prohibitions of this section apply wherever the interests of Paradigm Professional Health Services may be adversely affected, including any time an employee is:

- On Paradigm Professional Health Services or Paradigm Professional Health Services’ Client premises;
- Conducting or performing Paradigm Professional Health Services business, regardless of location;
- Operating or responsible for the operation, custody, or care of Paradigm Professional Health Services or client equipment or other property; or
- Responsible for the safety of others.

Prohibitions Include:

Alcohol and recreational marijuana

The following acts are prohibited and subject an employee to discharge:

- Unauthorized use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of alcohol or recreational marijuana; or
- Being under the influence of alcohol and/or recreational marijuana.

Illegal Drugs

The following acts are prohibited and subject an employee to discharge:

- Use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of any illegal drug or other controlled substance; or
- Being under the influence of any illegal drug or other controlled substance.

Legal Drugs

The following acts are prohibited and subject an employee to discharge:

- Abuse of any legal drug including medicinal marijuana;
- Purchase, sale, manufacture, distribution, transportation, dispensation, or possession of any legal prescription drug in a manner inconsistent with law; or
- Working while *impaired* using a legal drug *whenever* such impairment might:
- Endanger an employee’s safety or the safety of any other person;
- Pose a risk of significant damage to Paradigm Professional Health Services property; or
- Substantially interfere with job performance or the efficient operation of Paradigm Professional Health Services’ business.

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Disciplinary Action

A first violation of this Guideline may result in immediate discharge. A second violation of this Guideline at any time will result in an employee's immediate discharge.

An employee convicted under a criminal drug statute for a violation occurring in the workplace or during any Paradigm Professional Health Services-related activity or event will be deemed to have violated this Guideline.

Paradigm Professional Health Services, at the discretion of management, may choose not to discharge an employee for a first violation of this Guideline if the violation *did not*:

- Cause an injury to or endanger the safety of the employee or the safety of anyone else;
- Result in significant damage to Paradigm Professional Health Services or client property or pose a risk of significant damage; or
- Involve the possession of illegal drugs or other controlled substances in quantities greater than for personal use.

Such a discretionary choice by Paradigm Professional Health Services not to discharge an employee is conditioned on the employee satisfactorily completing an approved drug or alcohol abuse assistance or rehabilitation program when recommended by Paradigm Professional Health Services.

An employee discharged for a violation of this Guideline will not be eligible for rehire by Paradigm Professional Health Services.

Use of Legal Drugs

Impairment Due to Use of Legal Drugs

Paradigm Professional Health Services recognizes that it may be necessary for an employee to use legal drugs from time to time. Paradigm Professional Health Services also recognizes that an employee who is using legal drugs might become impaired by the drugs such that the employee's ability to perform his or her job duties or to perform them safely would be compromised. An employee may not work while the employee is impaired using legal drugs if the impairment might endanger the employee or someone else, pose a risk of significant damage to Paradigm Professional Health Services property, or substantially interfere with the employee's job performance. If an employee is so impaired by the appropriate use of legal drugs, an employee may not report to work. To accommodate the absence, the employee may use accrued PTO. Nothing in this Guideline is intended to sanction the use of accrued PTO to accommodate absences due to the **abuse** of legal drugs. Further, nothing in this Guideline is intended to diminish Paradigm Professional Health Services' commitment to employ and reasonably accommodate qualified disabled individuals.

Duty to Disclose

If an employee operates or is responsible in any way for the operation, custody, or care of Paradigm Professional Health Services or client property, or for the safety of any other person, the employee has a duty to disclose the nature of his or her job duties to any prescribing physician and to inquire of such physician(s) whether use of the drugs as prescribed might result in the dangers, risks, or impairment that this Guideline is intended to prevent.

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Authorized Conduct

Nothing in this Guideline is intended to prohibit the customary and ordinary use of over-the-counter drugs, so long as such activity does not violate any law or result in the employee or anyone else being under the influence of drugs in violation of this Guideline.

Unless the employee is in a designated safety-sensitive position, this Guideline is not intended to regulate the employee's conduct while off the job, so long as off-the-job use of alcohol or drugs does not result in the employee being under the influence of or otherwise impaired by the use of alcohol or drugs in violation of this Guideline.

Paradigm Professional Health Services may provide alcohol for consumption at certain events (e.g., social functions). The consumption of alcohol at these events does not violate this policy. Each employee is responsible for understanding his/her own tolerance for alcohol and taking the necessary steps to insure he/she does not engage in excessive consumption of alcohol or exhibit inappropriate behavior.

Counseling/Employee Assistance

If an employee suspects that he/she may have an alcohol or drug problem, even in the early stages, the employee is encouraged voluntarily to seek diagnosis and to follow through with the treatment as prescribed by qualified professionals. The employee must use any accrued PTO if he/she wishes to voluntarily enter and participate in an approved alcohol or drug rehabilitation program. If the employee's accrued PTO does not cover the time he/she is in the rehabilitation program, then he/she is encouraged to contact HR@p2healthservices.com, who will determine whether Paradigm Professional Health Services can accommodate him/her by providing unpaid leave for the time necessary to participate in the program. The employee should be aware, however, that participation in a rehabilitation program will not necessarily shield him/her from the imposition of disciplinary action for a violation of this Guideline, particularly if discipline is imposed for a violation occurring before the employee seeks assistance.

Disclosures any employee makes to Paradigm Professional Health Services concerning the employee's use of legal drugs or the employee's participation in any drug or alcohol counseling or rehabilitation program will be treated confidentially.

WORKPLACE VIOLENCE

Paradigm Professional Health Services recognizes that workplace violence is a concern among employers and employees across the country. Paradigm Professional Health Services and their Clients are committed to providing a safe, violence-free workplace and strictly prohibits employees, consultants, customers, visitors, or anyone else on company or client premises or engaging in company-related activities from behaving in a violent or threatening manner. As part of this policy, Paradigm Professional Health Services seeks to prevent workplace violence before it begins and reserves the right to deal with behavior that suggests a propensity toward violence even prior to any violent behavior occurring.

Workplace violence includes but is not limited to the following:

- Threats of any kind;
- Exhibiting physically aggressive or violent behavior, such as intimidation of, or attempts to,

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instill fear in others;

- Other behavior that suggests a propensity toward violence, which can include belligerent speech, excessive arguing or swearing, sabotage, or threats of sabotage of company or customer property, or a demonstrated pattern of refusal to follow Paradigm Professional Health Services' or Clients' policies and procedures;
- Defacing company or customer property or causing physical damage to the facilities; or
- Except for security personnel, bringing weapons or firearms of any kind on company or Client premises, in company or Client parking lots, at company or Client events, or while conducting company business.

If an employee observes or becomes aware of any of the above listed actions or behavior by an employee, customer, consultant, visitor, or anyone else, the employee should notify his or her Paradigm Professional Health Services manager and Client manager immediately. All reports of workplace violence will be taken seriously and will be investigated promptly and thoroughly. To the extent possible, Paradigm Professional Health Services will maintain the confidentiality of the reporting employee; and Paradigm Professional Health Services will not tolerate retaliation against any employee who reports workplace violence.

If Paradigm Professional Health Services determines that workplace violence has occurred, Paradigm Professional Health Services will initiate a decisive and appropriate response. The response may include, but is not limited to:

- Disciplinary action;
- Suspension or termination of employment;
- Suspension or termination of any business relationship;
- Civil and/or criminal prosecution of all persons involved.

TECHNOLOGY USE AND PRIVACY

Technology Resources Definition

“Technology Resources” consist of all electronic devices, software, and means of electronic communication including, but not limited to, the following: personal computers and workstations; lap-top computers, smartphones, personal digital assistants, mini and mainframe computers, computer hardware such as disk drives and tape drives, peripheral equipment such as printers, modems, fax machines, and copiers, computer software applications and associated files and data, including software that grants access to external services, such as the Internet, electronic mail, electronic timesheets, telephones, cellular phones, pagers, instant messaging systems, and voicemail systems.

Furnished Property

Clients may provide Technology Resources to authorized Paradigm Professional Health Services employees to assist them in performing their job duties for the Client. Employees need to adhere to Paradigm Professional Health Services' Clients' specific Technology Resource requirements. Each employee has a responsibility to use Paradigm Professional Health Services' Clients' Technology Resources in a manner that increases productivity, enhances Paradigm's and Client's public image, and is respectful of other employees. Employees must comply with all laws, statutes, ordinances, rules, and regulations of any governmental entity having jurisdiction. Failure

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to follow Clients' policies regarding its Technology Resources may lead to disciplinary measures, up to and including termination of employment. Moreover, Paradigm Professional Health Services reserves the right to advise appropriate legal authorities of any violation of law by an employee. All usage of Clients' Technology Resources is also subject to Paradigm Professional Health Services' Confidential Information policy.

Government Furnished Property

Government-furnished equipment may only be used in support of U.S. Government contracts. All items (excluding expendable items) purchased with task funds in support of a government contract, must be returned to the government at the end of the task.

Use of Technology Resources

Paradigm Professional Health Services and Clients' resources are to be used by employees only for purposes of conducting Paradigm Professional Health Services' and Clients' business. If applicable, employees may however use Paradigm Professional Health Services' Technology Resources for the following incidental personal uses so long as such use does not interfere with the employee's duties, is not done for pecuniary gain, does not conflict with Paradigm Professional Health Services' or Client's business, and does not violate any Paradigm Professional Health Services or Client policy:

- To send and receive necessary and occasional personal communications;
- To prepare and store incidental personal data (such as personal calendars, personal address lists, and similar incidental personal data) in a reasonable manner;
- To use the telephone for brief and necessary personal calls; and
- To access the Internet for brief personal searches and inquiries during mealtimes or other breaks, or outside of work hours, provided that employees adhere to all other usage policies.

Paradigm Professional Health Services assumes no liability for loss, damage, destruction, alteration, disclosure, or misuse of any personal data or communications transmitted over or stored on Paradigm Professional Health Services' or Clients' Technology Resources. Paradigm Professional Health Services accepts no responsibility or liability for the loss or non-delivery of any personal electronic mail or voicemail communications or any personal data stored on any Paradigm Professional Health Services property. Paradigm Professional Health Services strongly discourages employees from storing any personal data on any of Paradigm Professional Health Services' and Client's Technology Resources.

Improper Use of Technology Resources

- Prohibition Against Harassing, Discriminatory and Defamatory Use - Paradigm Professional Health Services is aware that employees use electronic mail for correspondence that is less formal than written memoranda. Employees must take care, however, not to let informality degenerate into improper use. Under no circumstances may employees use Paradigm Professional Health Services' or Clients' Technology Resources to intentionally transmit, receive, or store any information that is discriminatory, harassing, defamatory, indecent, threatening, or that otherwise could adversely affect any individual, group or entity in any way (e.g., sexually explicit or racial messages, jokes, cartoons, etc.).
- Prohibition Against Violating Copyright Laws - Employees must not use Paradigm Professional Health Services' or Clients' Technology Resources to copy, retrieve, forward or

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send copyrighted materials unless the employee has the author's permission or is accessing a single copy only for the employee's reference.

- Under no circumstances are employees permitted to use Paradigm Professional Health Services' or Clients' Technology Resources to intentionally access, download, or contribute to the following:
 - gross, indecent, or sexually oriented materials; or
 - gambling sites; or
 - illegal drug-oriented sites.
- Employees may not use any of Paradigm Professional Health Services' or Clients' Technology Resources for any illegal purpose, violation of any Paradigm Professional Health Services policy or Clients' policies, in a manner contrary to the best interests of Paradigm Professional Health Services, in any way that discloses confidential or proprietary information of Paradigm Professional Health Services, its Clients or third parties, or for personal or pecuniary gain.
- Employees should avoid sending confidential information over the Internet, except when necessary. Employees also should verify electronic mail addresses before transmitting any messages.

Access to Technology Resources

All messages sent and received, including personal messages, and all data and information stored on Paradigm Professional Health Services' electronic-mail system, voicemail system, or computer systems are Paradigm Professional Health Services property regardless of the content. As such, Paradigm Professional Health Services reserves the right to access all its Technology Resources at any time in its sole discretion. No employee other than the General Manger of Paradigm has authority to waiver, vary or amend Paradigm's right to access Technology Resources.

Although Paradigm Professional Health Services does not wish to examine personal information of its employees, on occasion, the LLC may need to access its Technology Resources including computer files, electronic-mail messages, and voicemail messages. Employees should understand, therefore, that they have no right of privacy with respect to any messages or information created or maintained on Paradigm Professional Health Services' Technology Resources, including personal information or messages. Paradigm Professional Health Services may at its discretion, inspect all files or messages on its Technology Resources at any time for any reason. Paradigm Professional Health Services may also monitor its Technology Resources at any time in order to determine compliance with its policies, for purposes of legal proceedings, to investigate misconduct, to locate information, or for any other business purpose. The best way to guarantee the privacy of personal information is not to store or transmit it on Paradigm Professional Health Services' technology resources.

In an effort to prevent unauthorized access to Paradigm Professional Health Services' proprietary information, Paradigm Professional Health Services' Technology Resources are password protected. Passwords do not confer any right of privacy upon any employee of Paradigm Professional Health Services. Thus, even though employees may maintain passwords for accessing Technology Resources, employees must not expect that any information and messages maintained on Technology Resources (including electronic mail and voicemail messages) are

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private. The best way for employees to ensure the privacy of personal information is to not store or transmit it on Paradigm Professional Health Services' Technology Resources. Employees are expected to maintain their passwords as confidential. Employees must not share passwords and must not access coworkers' systems without express authorization.

All employees should understand that any information kept on Paradigm Professional Health Services' or the Client's Technology Resources may be electronically recalled or recreated regardless of whether it may have been "deleted" or "erased" by an employee. Because Paradigm Professional Health Services periodically backs-up all files and messages, and because of the way in which computers reuse file storage space, files and messages may exist that are thought to have been deleted or erased. Therefore, employees who delete or erase information or messages should not assume that such information or messages are confidential or ever were confidential. If a legal dispute arises, or may arise in the future, it may be unlawful to attempt to delete or erase certain information. Employees shall fully comply with Paradigm Professional Health Services policy regarding retention or destruction of information.

So that employees understand the extent to which information is collected and stored, examples of information currently maintained by Paradigm Professional Health Services are provided below. Paradigm Professional Health Services may, however, in its sole discretion, and at any time, alter the amount and type of information it retains.

1. Electronic Timesheets: Records are kept of all timesheet entries.
2. Electronic Mail: Electronic mail is password-protected, an authorized administrator can read electronic mail and reset the password.
3. Desktop Facsimile Use: Copies of all facsimile transmissions are maintained in the facsimile server.
4. Document Use: Each document on Paradigm Professional Health Services computers has a history that shows which users have accessed the document for any purpose.
5. Internet Use: Internet sites visited, the number of times visited, and the total time connected to each site are recorded and periodically monitored.

The Internet and On-Line Services

Paradigm Professional Health Services and the Client may provide authorized employees access to online services such as the internet. Paradigm Professional Health Services expects that employees will use these services in a responsible way. Under no circumstances are employees permitted to use Paradigm Professional Health Services' or Clients' Technology Resources to access, download, or contribute to internet sites that contain inappropriate content such as that which is discriminatory, harassing, defamatory, obscene, indecent, threatening, or that otherwise could adversely affect any individual, group or entity.

Additionally, employees may not use Paradigm Professional Health Services' or Clients' Technology Resources to post, comment, send, or otherwise upload any information to any Web sites or other online groups, including web logs (i.e., "blogs"), social networking websites, newsgroups, discussion groups, or non-Paradigm Professional Health Services email groups, except in accordance with Paradigm Professional Health Services' Blogging Policy. Paradigm Professional Health Services strongly encourages employees who wish to access the internet for

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non-work-related activities to obtain their own personal internet access accounts that are unaffiliated with Paradigm Professional Health Services, and to use such accounts at home on their personal computer without making any reference to Paradigm Professional Health Services.

Paradigm Professional Health Services is very sensitive to the issue of protection of trade secrets and other confidential and proprietary information of both Paradigm Professional Health Services and third parties. “Confidential Information” includes all proprietary, confidential, and personal information covered by Paradigm Professional Health Services’ guideline in this manual regarding Confidential Information. Employees are expected to use good judgment and to adhere to the highest ethical standards when using or transmitting Confidential Information on Paradigm Professional Health Services’ and Clients’ Technology Resources.

Confidential Information should not be accessed through Paradigm Professional Health Services’ or Clients’ Technology Resources in the presence of unauthorized individuals. Similarly, Confidential Information should not be left visible or unattended.

Employees should adhere to Paradigm Professional Health Services’ security policy regarding Confidential Information and take all appropriate measures to safeguard the confidentiality and security of such information. Employees should avoid sending Confidential Information via the internet, except when necessary. Employees should also verify electronic mail addresses before transmitting any messages containing Confidential Information.

Software Use

No employee may load any software on Clients’ Technology Resources (e.g. computers), by any means of transmission, unless authorized to do so by the Client. Employees need to adhere to Paradigm Professional Health Services’ Clients’ specific Technology Resource requirements for software use.

Security

Paradigm Professional Health Services has installed a variety of programs and devices to ensure the safety and security of Paradigm Professional Health Services’ Technology Resources. Any employee found tampering or disabling any of Paradigm Professional Health Services’ or Clients’ security devices will be subject to disciplinary action up to and including termination. Moreover, Paradigm Professional Health Services reserves the right to advise appropriate legal authorities of any violation of law by an employee that results in the misappropriation, theft, or unlawful use of Paradigm Professional Health Services’ or Clients’ property or proprietary information.

To maintain the effectiveness of Paradigm Professional Health Services’ security measures, employees should use only secure networks established by Paradigm Professional Health Services to access or use corporate sensitive information. Such information may not be downloaded, stored, emailed to non-Paradigm Professional Health Services equipment, or copied on any non-Paradigm Professional Health Services equipment or media (including personally owned computer, handheld devices, external memory devices, or disks) without prior written approval of the President of Paradigm Professional Health Services. If corporate sensitive information is downloaded, stored, or copied on non-Paradigm Professional Health Services equipment or media, employee must take all appropriate measures to safeguard against loss, theft,

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damage, or breach of such equipment or media. If corporate sensitive information is downloaded, stored, or copied on non-Paradigm Professional Health Services equipment or media, employees must permanently delete such information prior to selling or otherwise transferring out of their own possession or control such equipment or media. If corporate sensitive information is downloaded, stored, or copied on non- Paradigm Professional Health Services equipment or media and employee resigns, is terminated, or is requested to do so by management, employees must delete all corporate sensitive information they received, including any and all copies thereof. Similarly, employees may not send corporate sensitive information to their personal email accounts, even for work-related purposes, without prior written approval of the President of Paradigm Professional Health Services.

Any loss or suspected loss of corporate sensitive information, or any suspicious activity such as external hacking attempts or unusual internal activity, should be reported immediately to the President of Paradigm Professional Health Services and HR@p2healthservices.com.

Only when it is mission critical *and* with the written approval of the Paradigm Professional Health Services President and Client, may an employee take a Paradigm Professional Health Services or Client electronic device (e.g., cell phone, smartphone, PDA, laptop) when traveling abroad for personal reasons.

Mobile Device Policy

Paradigm Professional Health Services prohibits the use of all handheld mobile devices including telephone, data, personal organizer, or other devices for work purposes while operating a motor vehicle or for personal purposes while operating a motor vehicle during work hours or on Paradigm Professional Health Services business. Moreover, all use of Paradigm Professional Health Services- or Client-issued mobile devices, or personally purchased mobile devices used for work-related purposes, must be made in accordance with Paradigm Professional Health Services policy, including the Technology Use and Privacy policy.

Employees may use hands-free mobile devices while driving when safe to do so. Special care should be taken in situations where there is heavy traffic, inclement weather, or the employee is driving in an unfamiliar area. Employees must adhere to all federal, state, and local rules and regulations regarding the use of mobile devices while driving.

Under no circumstances are employees allowed to use text devices to type or review text messages for work purposes while operating a motor vehicle or for personal purposes while operating a motor vehicle during work hours or on Paradigm Professional Health Services or Client premises.

At a minimum, any mobile devices used for accessing any Paradigm Professional Health Services or Client Technology Resources require basic security features enabled on them. This would include access to email, files or applications associated with Paradigm Professional Health Services or the Client.

Remote Access to Technology Resources

Paradigm Professional Health Services or Client, at their sole discretion, may provide certain

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employees with remote access systems such as a laptop to allow such employees to handle the tasks associated with their jobs while working away from the office. It is the employee's responsibility to protect and ensure the security of all Paradigm Professional Health Services- and Client-provided equipment. Employees must not share network passwords or other PINs with anyone. As soon as an employee believes Paradigm Professional Health Services-or Client-provided equipment is lost or that the security and confidentiality of the data on that equipment has been compromised, he or she must notify his or her Paradigm manager and Client program manager. If Paradigm Professional Health Services-or Client- provided equipment is lost, or if it is damaged because of carelessness, employees may be responsible for replacement fees. The Paradigm Professional Health Services- or Client-provided remote access system should only be used for Paradigm Professional Health Services or Client related business. Paradigm Professional Health Services may decide that it is no longer necessary for certain employees to possess a remote access system and their ability to use such systems may be discontinued, in which case such employees are expected to return any Paradigm Professional Health Services-issued remote access systems in accordance with Paradigm Professional Health Services' "Company Property" policy.

Use of public or home networks, such as unencrypted Wi-Fi networks, can be a threat to the security and reliability of Paradigm Professional Health Services' or Client's Technology Resources.

It is the employee's responsibility to read, understand, and adhere to the specific guidance that is provided in this Technology and Privacy policy. For additional information or if there are questions regarding this policy, employees should contact HR@p2healthservices.com.

Electronic Mail Guidelines

Employees are expected to use good judgment with respect to use of electronic mail ("email"). While email provides an easy manner with which to communicate, it is not appropriate to say in an email something that would never be said in person or in formal correspondence. All employees should adhere to the following with respect to use of email:

1. *Always ask before sending an email if it is the appropriate medium of communication.* When communicating about a sensitive subject, consider whether email is the appropriate medium or whether using the phone rather than email might be more appropriate (but keep in mind that voicemail is similar to email; voicemail may be stored on a computer server and may be forwarded to third parties).
2. *Email is part of the workplace environment.* Email containing rude and insensitive comments is not only personally embarrassing, but also may serve as the basis for legal liability. Employees and managers should exercise the same care and sensitivity in communicating via email as they would when they communicate in person or in traditional forms of writing. Off-the-cuff, sarcastic, or angry comments can come back to haunt the author. Offensive email received from others should not be forwarded, and the recipient should ask the sender to refrain from sending inappropriate email.
3. *Know your audience.* When sending an email, always double-check to whom the email is

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addressed, especially when using the “reply to all” button. Ask whether it is appropriate for each addressee to receive the email and whether sending the email to an addressee will result in the unauthorized disclosure of Confidential Information. If in doubt, remove the doubted addressee.

4. *Do not use a home PC for business purposes.* Employees should understand that, if there is any concern that a court hearing a business dispute involving Paradigm Professional Health Services and a third party may require producing one’s hard drive from his or her home computer, he or she should not use a home computer for business purposes. Email relating to Paradigm Professional Health Services business, even though stored on a home computer, is recoverable and discoverable in litigation.

Audits

Paradigm Professional Health Services may perform auditing activity or monitoring to determine compliance with these policies. Audits of software and data stored on Paradigm Professional Health Services’ Technology Resources may be conducted at any time without warning.

BLOGGING POLICY

Employees may post freely and exchange opinions on interactive websites in any way that is constructive and follows all Paradigm Professional Health Services policies and codes of conduct. This policy covers employees creating, posting, commenting, or uploading to any internet websites including any Paradigm Professional Health Services sponsored site as well as any non-Paradigm Professional Health Services external site, such as media sites, chat rooms, bulletin boards, newsgroups, discussion groups, non-Paradigm Professional Health Services email groups, personal websites, video sharing sites, picture sharing sites, dating sites, and social networking sites whether or not such sites are set to private. Any inappropriate blog postings that violate these guidelines should be reported to Paradigm Professional Health Services’ manager or HR@p2healthservices.com. Any questions or concerns about blogging, or this Blogging Policy should be directed to the employee’s Paradigm Professional Health Services manager or HR@p2healthservices.com.

Paradigm Professional Health Services-Sponsored Blogs

If applicable, each employee is responsible for using Paradigm Professional Health Services blogs in a way that is constructive, protects Paradigm Professional Health Services’ proprietary and confidential information, and is respectful of others.

Paradigm Professional Health Services’ policies regarding access to Technological Resources and monitoring of online services apply to Paradigm Professional Health Services’ blogs. Paradigm Professional Health Services retains the right to delete or modify any content it deems inappropriate in its sole discretion. Furthermore, Paradigm Professional Health Services has the right to require any employee involved in posting inappropriate content to stop posting immediately. Employees who are assigned to maintain Paradigm Professional Health Services blogs are responsible for removing inappropriate content in a timely manner and reporting the inappropriate content to the Paradigm Professional Health Services president or HR@p2healthservices.com.

Paradigm Professional Health Services blogs are intended for work-related issues. Each

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employee blogs/posts at his or her own risk and is personally and legally responsible for what he or she posts, including compliance with all applicable laws, Paradigm Professional Health Services policies, and Paradigm Professional Health Services codes of conduct.

Content posted on Paradigm Professional Health Services blogs in support of a contract must follow the processes for delivery of information and contract deliverables. It is the responsibility of the employee to understand these processes. It is the responsibility of the Paradigm Professional Health Services employee to get approval from the Paradigm Professional Health Services President prior to posting the blog. The Paradigm Professional Health Services President will review for appropriateness.

The posting of copyrighted materials on Paradigm Professional Health Services' blog must be approved by HR@p2healthservices.com. Employees must respect copyright and fair use laws when posting and as a best practice, always credit and/or link to someone else's work when quoting or relying upon it.

Non-Paradigm Professional Health Services Blogs

Employees are free to create or participate in non-Paradigm Professional Health Services social media sites ("non- Paradigm Professional Health Services blogs") and other forms of online publishing and discussion that are work related. Employees blog/post at their own risk and are personally and legally responsible for their postings and comments. Paradigm Professional Health Services will not assume any liability or risk for an employee's blogging or posting online. When posting in a non-Paradigm Professional Health Services blog or online forum, if the blog in any way identifies Paradigm Professional Health Services or discusses Paradigm Professional Health Services or its business or its Clients, the employee must identify himself or herself as a Paradigm Professional Health Services employee, speak in the first person, and make it clear that what is being said is representative of the employee's personal views and opinions and does not necessarily reflect the views and opinions of Paradigm Professional Health Services or its Clients. In no way may employees represent or suggest that their opinions or positions are endorsed by Paradigm Professional Health Services or any of its managers, officers, or employees or its Clients.

Prohibited Behavior for Paradigm Professional Health Services-Sponsored and Non-Paradigm Professional Health Services Blogs

Employees must always comply with Paradigm Professional Health Services' policies regarding non-disclosure of proprietary, confidential and personal information, while on Paradigm Professional Health Services and non- Paradigm Professional Health Services blogs. Accordingly, employees are prohibited from:

- Revealing, or making any reference to, any proprietary or confidential information, trade secrets, or other information covered by such policy. Even vague or disguised references to such information could violate Paradigm Professional Health Services policies and applicable laws.
- Posting any information which violates laws regarding libel, defamation, copyrights, trademarks, data theft, disclosure of material non-public information, disclosure of confidential or trade secret information, harassment or privacy.
- Re-publishing postings or statements of other Paradigm Professional Health Services

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employees.

- Using Paradigm Professional Health Services logos, trademarks or other intellectual property or adding a link to Paradigm Professional Health Services' website without Paradigm Professional Health Services' written permission.
- Identifying a competitor and openly advertising or promoting for the competitor to the potential detriment of Paradigm Professional Health Services.
- Identifying a Paradigm Professional Health Services client, partner, vendor, supplier or affiliate by name, and discussing the confidential information of a Paradigm Professional Health Services client, partner, vendor, and supplier or affiliate online.
- Posting any content that is harassing, discriminatory, defamatory, threatening, disparaging, libelous or otherwise illegal or injurious.
- Posting comments that are openly critical or hostile of the countries to which they travel.
- Using non-Paradigm Professional Health Services blogs for internal business-related communications between fellow employees.

Non-Paradigm Professional Health Services blog postings may generate media interest or coverage. Employees are not authorized to speak on behalf of Paradigm Professional Health Services. If a member of the media contacts an employee about a Paradigm Professional Health Services related posting or online comment published by the employee, or requests Paradigm Professional Health Services information of any kind, the employee must not provide any information and should contact Paradigm Professional Health Services' president or HR@p2healthservices.com immediately.

EXTERNAL COMMUNICATIONS

Occasionally, an employee may be contacted by outside sources requesting information about Paradigm Professional Health Services matters, including information regarding current or former employees, Paradigm Professional Health Services projects, or other workplace issues. In order to avoid providing inaccurate or incomplete information to outside sources, and the possible negative exposure that may result from providing information about Paradigm Professional Health Services, or its contracts, clients or employees to outside sources, any employee contacted by any outside source regarding Paradigm Professional Health Services should immediately contact HR@p2healthservices.com as detailed below.

Media Contacts

If an employee is contacted by a representative from any media organization, (e.g., television, radio, or newspaper reporters), the employee should immediately refer the media representative to HR@p2healthservices.com.

Outside Attorneys and Investigators

If an employee is contacted by an outside attorney or investigator regarding Paradigm Professional Health Services business including information regarding current or former employees, Paradigm Professional Health Services clients, Paradigm Professional Health Services contracts or other matters, or other workplace issues, the employee should immediately contact HR@p2healthservices.com.

Employment References and Verification

Employees contacted by an outside source requesting employment verification for a current or

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former employee should not provide any information to the requesting individual or organization. Employees should refer the requesting individual or organization to HR@p2healthservices.com. No employee, other than the Human Resources Department personnel is authorized to provide employment verification for any current or former employee.

I have read Paradigm's Code of Business Ethics and Conduct, and I understand and agree to abide by all stated terms of the Code of Business Ethics and Conduct.

X _____ Date _____
Sign