



Code of Conduct

Triad Isotopes, Inc. does everything it can to deliver the highest quality nuclear pharmacy services to its customers and ultimately, to the individual patients who receive radiopharmaceuticals from Triad. All of Triad's nuclear pharmacy services must be delivered in compliance with all laws and rules and more importantly, with the highest professionalism and integrity. This Code of Conduct was developed to help each Triad team member make good decisions about their daily activities, so the Triad organization can meet these objectives.

This Code of Conduct will never be a substitute for common sense and personal integrity, but it has been put together to spell out a basic set of minimum standards that all Triad team members are required to follow every day. These standards are the basis of Triad's values based compliance program and failure to follow these standards will result in disciplinary action and/or termination of employment.

If any of these basic standards are unclear or if you are not sure whether they apply to a particular situation that you encounter as a Triad employee, please ask your supervisor, discuss the situation with Triad's Chief Compliance Officer or ask the question by calling the Triad Compliance Hotline at any time. The number is 1-877-73-TRIAD (1-877-738-7423). No question is too basic and no action of retaliation or reprisal will be taken against any Triad employee for calling the Triad Compliance Hotline to make a report, a complaint or initiate an inquiry.

Condition of Employment

The policies incorporated in this Code of Conduct are mandatory and must be followed. Failure to comply with any of the provisions of this Code of Conduct will result in disciplinary action, up to and including termination of employment with Triad or cancellation of contractual or business relationships with customers, contractors and agents.

Work Environment

Triad Isotopes is committed to providing a safe and healthy workplace for all employees, customers and visitors. Supervisors, Managers and Administrators must establish and maintain an environment in their work area and areas of control in which compliance

with laws and regulations is required and is part of the workplace culture. Triad has developed policies to protect employees from potential workplace hazards, including, but not limited to, sound radiation protection principles to achieve occupational and member of public doses that are as low as reasonably achievable (“ALARA”). You should become familiar with and understand these policies. It is important for you to advise your supervisor of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action can be taken to resolve the issue(s).

Harassment/Intimidation

Each Triad employee, customer or visitor has the right to work and visit an environment that is free of harassment or intimidation of any kind. Triad will not tolerate harassment of anyone by Triad employees, customers or visitors at any time, inside or outside the Triad workplace. Degrading or humiliating jokes, slurs, intimidation or other harassing behavior will not be tolerated. Prohibited harassment includes, but is not limited to any harassment or inappropriate behavior based upon any individual’s race, national origin, sex, age or religious beliefs. Unwelcome sexual advances and requests for sexual favors in conjunction with employment decisions are prohibited and any verbal, written or physical conduct of a sexual or intimidating nature that interferes with any individual’s dignity or work performance or that create an intimidating, hostile or offensive workplace will not be tolerated. It is important for you to advise your supervisor of any harassment or intimidation situation, so that timely corrective action can be taken to resolve the issue(s).

Workplace Violence

All Triad employees have the right to work in an environment that is free of violence. Triad has adopted a Workplace Violence Policy that is contained in the Triad Employee Handbook that is given to all Triad employees. In addition, Triad will not tolerate any of the following activities by Triad employees, customers or visitors of Triad within a Triad facility or while performing activities on behalf of Triad at any location;

- Robbery, terrorism, hate crimes, property destruction, identity theft, stalking, physical violence or the threat of physical violence directed at individuals or Triad itself.
- Licensed or unlicensed possession of any weapons, explosives or other dangerous materials while on any Triad property, including all parking areas used by Triad employees, while operating a Triad vehicle or while on Triad business at any location.

It is important for you to advise your supervisor of any possible or actual workplace violence situation, so that timely corrective action can be taken to resolve the issue(s).

Professional Licenses

All Triad employees and independent contractors of Triad that are required to have valid, personal state or federal permit(s), license(s) or registration(s) to perform their duties on behalf of Triad, shall maintain them in good standing at all times while they are employees or contractors of Triad. These employees and contractors shall also comply with all applicable laws, rules and regulations, continuing education obligations and professional standards at all times while employed or contracted by Triad. No Triad employee or contractor will be allowed to perform their job functions at any time that their personal permit(s), license(s) or registration(s) are not in good standing with the applicable state or federal agencies that issued them.

Each Triad employee or independent contractor shall notify their supervisor immediately if any action is taken by any agency or court of law that may impact their personal permit(s), license(s) or registration(s) and/or their ability to perform their job functions on behalf of Triad. Each Triad employee and independent contractor will also supply any written correspondence or other documents that they receive from any agency or court of law that may impact their personal permit(s), license(s) or registration(s) to their supervisor immediately upon receipt and upon request at any time.

Hiring of Excluded Individuals

Triad will not knowingly hire or engage any individual or organization as a subcontractor, consultant or supplier that has been excluded from participation in any government healthcare programs. Triad will check each prospective Triad employee against the Department of Health and Human Services Office of Inspector General Fraud Exclusion Database, (located at <http://exclusions.oig.hhs.gov/>), as part of the Triad pre-employment screening process. Triad will also check all organizations, subcontractors, consultants or suppliers against the same database before finalizing any contractual relationships with such organizations.

It is important for you to advise your supervisor of any information about any excluded individuals or organizations that you are aware of that have any relationship with Triad, so that timely corrective action can be taken to resolve the issue(s).

Substance Abuse

Triad shall maintain a strict alcohol and drug free workplace for the safety of all Triad employees, Triad guests, Triad customers and patients and the general public. An alcohol and drug free workplace will be achieved by enforcing the Triad Substance Abuse Policy contained in the Triad Employee Handbook that is distributed to all Triad employees when they are hired.

It is important for you to advise your supervisor of any substance abuse that you observe, so that timely corrective action can be taken to resolve the issue(s).

Environmental Compliance

Triad shall use its best efforts to protect the environment and shall obtain all required permits, licenses and registrations to handle, store and dispose of, all of the substances that Triad utilizes in the normal course of business. Triad shall also comply with all applicable environmental laws, rules and regulations and all Triad employees are required to handle all radioactive materials, bio-medical waste and hazardous wastes generated by Triad in compliance with all such laws, rules and regulations and the rules and regulations of any waste disposal organizations that Triad utilizes on a regular basis.

It is important for you to advise your supervisor of any environmental issues that you observe, so that timely corrective action can be taken to resolve the issue(s).

Conflicts of Interest

In order to perform his/her duties with honesty and fairness and in the best interest of Triad, all employees must avoid conflicts of interest in their employment. A conflict of interest may occur if outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. Conflicts of interest may arise from soliciting or accepting gifts and/or excessive entertainment or gratuities from any person or entity that does, or is seeking to do, business with Triad.

It is important for you to advise your supervisor of any conflicts of interest you observe, so that timely corrective action can be taken to resolve the issue(s).

Prohibited Activities with Customers and Vendors

Employees will not engage in any activities that involve illegal payments of cash or other items of value, or receive of payments of cash or other items of value, for patient referrals, patient inducements or in return for purchases or leases or recommendations to purchase or lease any supplies, equipment or services from Triad or by Triad. No entertainment of Triad Clients or their representatives may exceed the expenditure limits contained in the Triad Travel & Entertainment Policy and Procedure. Violation of these entertainment limits shall result in no reimbursement of these expenditures and/or discipline of the employee involved, up to possible termination of such employees employment with Triad.

Employees will not engage in any form of anti-competitive behavior or “price fixing” with competitors or any other individuals or organizations.

It is important for you to advise your supervisor of any prohibited relationships with customers or vendors that you observe, so that timely corrective action can be taken to resolve the issue(s).

Privacy and Confidentiality

During the course of his/her duties as an employee of Triad Isotopes, employees will have access to information that is confidential and/or proprietary to Triad and the patients that Triad serves. All patient information is regarded as confidential and each patient is entitled to protection of that information. Triad will respect each patient's right to privacy and security of their protected health information ("PHI") and shall comply with all of the requirements of the Health Insurance Portability and Accountability Act and all related, applicable regulations ("HIPAA"). Other proprietary Triad information may not be used or disclosed outside the context of each Employee's duties and functions, in his/her service to Triad.

It is important for you to advise your supervisor of any inappropriate disclosure of PHI or confidential Triad information, so that timely corrective action can be taken to resolve the issue(s).

Billing and Credit Balances

Triad shall ensure that all billings are true, accurate and conform to applicable Client Provider Agreements and all applicable Federal and state laws and regulations. Each employee of Triad shall use their best efforts to prohibit any employee or agent of Triad from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious or fraudulent. If a billing error or any error related to a Triad Provider Agreement is detected, immediate notification of your supervisor is mandatory. If the situation is not resolved in a timely fashion, the matter shall immediately be reported to the Triad Compliance Hotline so that the Chief Compliance Officer of Triad can investigate the matter and intervene, if necessary. Triad shall comply with all applicable Federal and state laws and regulations governing credit balance reporting and refund(s) of all overpayments in a timely manner.

It is important for you to advise your supervisor of any improper billing and/or credit balance situations that you observe, so that timely corrective action can be taken to resolve the issue(s).

Reporting of Noncompliance

If an area of potential noncompliance is discovered, each Triad Employee shall report this to his or her immediate supervisor. If the Employee is not comfortable with reporting noncompliance with his or her immediate supervisor, he or she has three approved alternate courses of action, as follows;

1. He or she may follow the Communication and Resolving Problems section in the Triad Employee Handbook; or,
2. He or she may report the matter to the Triad Chief Compliance Officer; or,

3. He or she may access the Triad Compliance Hotline via telephone or email.

These reports will be kept confidential and shared only on a bona fide need-to-know basis. Triad will take no adverse action against employees reporting noncompliance, whether or not they ultimately prove to be well founded, as long as they are submitted in good faith and without malicious intent.

Triad Code of Conduct Acknowledgment Form

This is to acknowledge that I have received and reviewed Triad Isotopes Code of Conduct. I agree to comply with the standards contained in the code and all related policies and procedures as a condition of my continued employment or association with the Triad. I acknowledge that the Code of Conduct is only a statement of principles for individual and business conduct, and does not constitute an employment contract. I will report any potential violation of the Code of Conduct, of which I become aware, promptly to my supervisor or the Triad Chief Compliance Officer. I understand that any violation of the Code of Conduct may be grounds for disciplinary action, up to and including discharge from employment with Triad.

Signature

Print

Title and Primary Work Location

Date