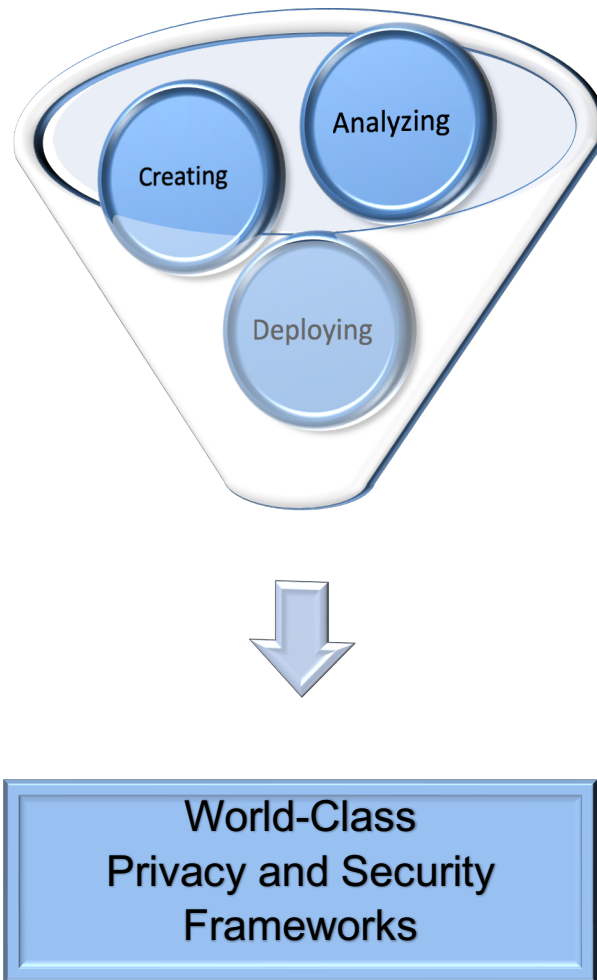




Veronica K. Contreras P.C.



BUSINESS CODE OF ETHICS



VKC-PC Mission Statement: To bolster organizations' data privacy and security compliance by analyzing, creating, and deploying world-class privacy and security governance frameworks.



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Dear Fellow Colleagues:

Veronica K. Contreras, P.C. ("VKC-PC") is committed to the highest standards of ethical business conduct, and compliance, with laws and regulations that apply to our business. Each of us are personally responsible for supporting our core values, which consist of **honesty, integrity, collaboration, accountability, and compliance**. We have issued our Business Code of Ethics ("Code") to restate, demonstrate our commitment to uphold that responsibility and ensure our values are reflected in our daily business activities and operations. A commitment to honesty, integrity, collaboration, accountability, and compliance are critical to our continued success.

Please take the time to read, and understand, our Code. You are responsible for complying with the Code, seek guidance, where necessary, and to raise any concerns that may be a violation of our Code or company policies.

It is our intent that the Code encourages collaboration about key compliance, and ethical issues, that you may face in your day-to-day business activities and how to respond appropriately to such issues.

Thank you for taking the time to read, and understand, our Code; and more importantly, for taking personal responsibility to be sure we always live up to our core values and commitments.

Sincerely,

Veronica Contreras
President/Owner



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1. Introduction

Veronica K. Contreras, P.C. ("VKC-PC," "us," "our," or "we") is committed to the highest ethical standards, and business conduct, and promotes a culture of honesty, integrity, collaboration, accountability, and compliance with applicable laws and regulations. Our reputation for honesty, and integrity, among our employees, clients, Vendors (defined below), and other third parties is the key to our success.

This Code is central to our core vision and values, supports our priorities in how we conduct business, is designed to prevent wrongdoing, and promote (in no particular order):

- Honest and ethical business practices and conduct;
- Integrity;
- Collaboration;
- Accountability; and
- Compliance with applicable laws and regulations.

Our Code establishes the criteria for how to respond to daily business situations ethically and honestly, but also identifies resources that you may use to ask questions (or raise concerns) regarding compliance with this Code or questions related to ethical business conduct practices. Please read this Code carefully.

Use common sense, and good judgment, in applying this Code. If you feel our Code standards have not been met, need access to policies, are still unsure about what you should do, or have any questions, please ask for guidance by contacting your manager, or send your questions to compliance@vkc-pc.com

2. Code Applicability and Compliance

This Code applies to all VKC-PC's employees, officers, and directors; it also applies to VKC-PC's suppliers, vendors, contractors, consultants, and agents (collectively, "Vendors") for any work they perform on VKC-PC's behalf. We expect our Vendors to comply with the ethical and legal standards described in our Code. This Code applies everywhere VKC-PC conducts its business and anytime you represent VKC-PC. It applies in VKC-PC's office locations, VKC-PC clients' locations (when, and if, you are onsite), and during all other work-related activities, wherever located, including, but not limited to: 1) remote work locations; and 2) offsite events and business trips.

As a VKC-PC employee, you signed a confidentiality disclosure agreement ("CDA") as part of our employee on-boarding process; you have also been provided an employee handbook and other relevant policies (together, "Documents"). Our code does not replace the Documents' relevance or obligations therein. If the contents of the Documents conflict with any Code content, the Code will govern. Waivers of this Code will be granted only under exceptional circumstances. Any waiver from this Code requires the approval of the President/Owner (or authorized designee); or in the case of a waiver sought by the Board of Directors, the approval of the VKC-PC Board of Directors is required.

All employees, and Vendors, are expected to comply with our Code. This means that you must understand, and comply, with all company policies and applicable laws and regulations that apply to your job responsibilities. Our Code also requires you to seek guidance (where needed), report any concerns, and fully cooperate with relevant investigations for suspected Code violations.

Annually, employees are required to sign an "Attestation Form" (attached hereto as Exhibit A) which confirms that you have reviewed the Code, understand it, and comply with its standards and requirements. Vendors' Code compliance will be reviewed as part of our Vendor management requirements; however, Vendors will also be required to sign our Attestation Form, as part of our Vendor on-boarding due diligence requirements. Anyone who violates our Code creates the possibility of exposing themselves, and VKC-PC, to unnecessary risk and may be subject to further action by VKC-PC.



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All employees, including our Vendors, are expected to respect, and obey, applicable laws and regulations in the locations where our business activities are occurring. If you are unsure about an activity that may be unlawful, or conflicts with requirements under our Code, you should contact your manager or send questions to compliance@vkc-pc.com.

3. Compliance with Laws and Regulations

VKC-PC complies with applicable laws and regulations in each city, state, and country in which it conducts business, including without limitation: 1) data protection and confidentiality; 2) artificial intelligence; 3) employment and labor in the workplace; 4) antitrust and anti-corruption; 5) political activity; 6) government inquiries; 7) gifts and entertainment; and 8) conflicts of interest.

A. Data Protection and Confidentiality

- i. VKC-PC's data privacy and security governance model ("Model") is an integral part of our company culture, one that is central to our daily business activities and operations, and tailored to respect the privacy, and security, of our employees, clients, Vendors, and other persons who are involved with our business ("Persons"). The Model establishes guidelines, and principles, to protect Persons' applicable protected health information, personally identifiable information, including personal and sensitive personal data, financial information, and other proprietary information (collectively, "Information") we may collect from (or store from) Persons in support of our business activities and operations, in accordance with applicable data protection laws and regulations. Information also extends to our intellectual property, such as trademarks, trade secrets, copyrights, marketing plans, salaries, and any other company documentation created (or collected) as part of our business activities and operations. Further details about our intellectual property, and proprietary data, are listed under Section 6 below.
- ii. Our Model applies global standards, which entails satisfying applicable data privacy and security legislation requirements, including without limitation: 1) Establishing data protection policies; 2) Requiring annual data protection awareness training that promotes our Model guidelines and principles; 3) Establishing privacy and security operational objectives; 4) Performing appropriate due diligence of our Vendors; and 5) On-going review of our Model to ensure compliance with applicable data privacy and security legislation.
- iii. Your signed CDA (or applicable Vendor service agreement) supports compliance with our Model. The CDA requires you to safeguard Information (including Information our clients provide to us in support of applicable services) consistent with our Model requirements and extends beyond your departure from our company. Upon your exit from our company, you must return all Information in your possession.
- iv. You must ensure, Information provided to you by us, or applicable Persons, is kept confidential and only used, or disclosed, in support of our business activities and operations, in accordance with your job function or is required by law or regulation. You should avoid sharing Information with other VKC-PC employees unless they have a business "need-to-know" to such Information. Proper use, and disclosure, requirements extend to all relevant Persons' Information. We must ensure we protect such Information to maintain our reputation, trust, and confidence among all relevant Persons. Information must never be used (or disclosed) for personal gain or disclosed to other unauthorized parties, unless otherwise authorized. You must be careful what you discuss (concerning relevant Information) in public places or when using mobile devices; those conversations, or mobile device screens, may be overheard (or viewed) by unauthorized individuals. Where allowable, proper care needs to be taken when sending Information,



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electronically, to make sure it is adequately protected. Unless otherwise authorized, Information must never be disclosed on social media.

- v. All company-issued applications/systems (including applicable company proprietary Information stored in such applications/systems) used by employees in support of their daily job functions, are considered VKC-PC's property. This includes, without limitation: company-owned Information; email; instant messaging; company-issued equipment (e.g., laptops); and other business application subscriptions (e.g., Microsoft 365, Box). VKC-PC reserves the right to access, retrieve, and review (collectively, "Actions") all Information stored in its applications/systems, or company-issued equipment, including Information sent or received, to ensure compliance with applicable laws and regulations. Unless prohibited by applicable local laws or regulations, you should not expect to have an expectation of privacy regarding such Actions. You must be responsible when using electronic systems and devices, such as computers and mobile devices ("Devices"). We must ensure we protect our Devices – and the Information stored in them – from misuse, improper access, damage, and theft. You must avoid activities that may compromise Device and applications/systems' integrity, such as installation of unapproved hardware, or software, on company-issued equipment and using a personal computer to do company business unless you are authorized to do so. Never use company-issued application/systems, or Devices, for activities that are unlawful, unethical, or contrary to this Code and our policies and procedures.
- vi. If you believe that a potential privacy, or security, incident may have compromised applicable Information, applications/systems, or Devices in an unauthorized manner, it must be reported to the VKC-PC Data Privacy Office, no later than the **SAME** calendar day, at dataprivacy@vkc-pc.com.
- vii. If you are unsure about whether certain data qualifies as Information, how it may be used and disclosed, or have any other questions about our Model guidelines, and principles, you may contact the VKC-PC Data Privacy Office at dataprivacy@vkc-pc.com.

B. Artificial Intelligence ("AI")

- i. As AI technology advances and is integrated into more companies' operational practices, responsible AI use is critical. Because of this, VKC-PC is committed to compliant, ethical, and productive AI use.
- ii. Any AI use by VKC-PC employees, and its Vendors, must comply with this Code, applicable AI legislation (such as the EU AI Act, California AI laws, and other relevant AI laws that apply to VKC-PC's business activities and operations), and any other applicable legal and regulatory requirements that governs AI use.
- iii. While we encourage our employees to explore, and leverage, AI to support relevant day-to-day job functions, certain AI uses require greater due diligence and oversight. As such, the following parameters apply for any AI use:
 - a. Employees are permitted to leverage Microsoft Co-Pilot (or other similar AI tools, such as ChatGPT) to conduct basic searches, or ask an AI tool questions, which are intended to support the relevant inquiry (e.g., can you show me how to configure a formula in Excel, so I can aggregate the information in multiple columns; can you summarize this regulation for me?) but employees **MAY NOT** include, reference, upload, or incorporate, any VKC-PC, client, or Vendors' Information, within any AI tool, unless authorized, in writing, by the VKC-PC Data Privacy Office, applicable client, or Vendor, and any necessary documentation required to support appropriate permissions, have been collected (e.g.,



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informed consent), where required. This data restriction may also extend to images, or content, made publicly available through the Internet, if the relevant content, or images, are protected under applicable copyright laws. If you are uncertain whether any publicly available data are protected under relevant copyright laws or requires appropriate permission to use such information, you must reach-out to the VKC-PC Data Privacy Office, at: dataprivacy@vkc-pc.com before you proceed with leveraging any publicly available data, incorporate it into any AI tool;

- b. Employees are permitted to use AI to draft emails and text messages, create internal templates, policies, procedures, and memos, so long as relevant client, and Vendor Information are not incorporated into the applicable AI communication (i.e., emails and text messages) or internal VKC-PC materials. Employees **MAY NOT** use any AI tool to generate client or Vendor deliverables (e.g., policies, procedures, memos, and any other documentation), unless authorized, in writing, by the VKC-PC Data Privacy Office and the relevant client or Vendor (where applicable). If you choose to use AI to write emails or texts, those communications, where legally required, must indicate that AI was used to generate the content. If you are uncertain when there may be transparency obligations to disclose use of any AI, you must reach-out to the VKC-PC Data Privacy Office, at: dataprivacy@vkc-pc.com;
- c. Where any application/system embeds AI into an application/system's operating software, such as Box.com, employees may not use the relevant integrated AI technology, unless the applicable AI tool has been approved for use by VKC-PC's Data Privacy Office. To determine which AI tools have been approved for use by VKC-PC's Data Privacy Office, please reach-out to dataprivacy@vkc-pc.com;
- d. Any AI tool, inclusive of any authorized Vendor AI application/system, will be required to go through appropriate due diligence requirements, such as completion of a compliance assessment, review of all data that may be used to design or train an AI model, review of applicable intellectual property rights, ensuring adequate security controls are enabled to protect any authorized Information that may be stored in an AI application/system, ensuring adequate contractual obligations are in place, and any other requirements needed to support relevant AI legislation requirements; and
- e. Employees **MAY NOT** purchase, or use, any AI tool that is not authorized per this Code, or approved by VKC-PC's Data Privacy Office, to support any relevant VKC-PC business activities and operations, where applicable.

C. Employment and Labor in the Workplace

- i. Diversity, and inclusion, are key elements of VKC-PC's business because we believe that diversity builds a stronger company culture. We treat all employees (and prospective employees) equally with respect, and integrity, and expect our employees to treat one another respectfully and apply high-moral standards in the workplace and when performing business activities and operations.
- ii. VKC-PC provides equal employment opportunities for all directors, officers, job applicants, and employees. Our process to recruit, hire, promote, compensate, pay benefits and promotions, discipline, train, terminate, and make all other employment-related decisions is based on individuals' abilities, experience, skills, education, and future development and potential, without regard to an individual's race, color, religion, national origin, age, gender, sexual orientation, marital status, disability, veteran status, or any other classification protected by applicable law. You may refer to VKC-PC's Employee Handbook for further information.



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- iii. VKC-PC is committed to creating a working environment free of discrimination and harassment. Harassment or unlawful discrimination of a sexual, racial, ethnic, disability, protected veteran status, age, religious nature, or based on any other factor prohibited by applicable law, is strictly forbidden. Any harassment of employees, retaliation against employees, or complaining of harassment is prohibited, regardless of the working relationship. Similarly, harassment of employees by any clients, Vendors, or other third-party, will not be tolerated. Any employee who violates these requirements, will be subject to disciplinary action, up to and including termination. If the prohibited behavior occurs by a Vendor, client, or any other third-party, appropriate remedial action will be taken.
- iv. Sexual harassment consists of unwelcome advances, requests for sexual favors, or other verbal, visual, or physical conduct of a sexual nature where:
 - a. Submission to such conduct is made (either explicitly or implicitly) a term, or condition, of an individual's employment or business;
 - b. Submission to, or rejection of, such conduct by an individual is used as a basis for employment, or other business decisions affecting, such individual; or
 - c. Such conduct has the purpose, or effect, of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment, as viewed from the perspective of a reasonable person.
- v. Other forms of unlawful harassment, discrimination, violence, threats, or intimidating conduct are also strictly prohibited. Prohibited harassment, discrimination, violence, threats, or other intimidating conduct may occur in, or outside of, the workplace and can occur through electronic or other communication means (e.g., social media). Such examples may include, without limitation: racial epithets; slurs; derogatory remarks; use of stereotypes; slander; ridicule; persistent name calling; abusive or offensive remarks; discriminatory, harassing, threatening phone calls, emails, written communications directed towards you or your family members; stalking; the destruction of personal property or company assets; jokes; posters; or cartoons based on race, religion, color, national origin, sex, age, disability, genetic information, military status, or any other characteristic protected by applicable laws and regulations. Dangerous items of any kind, such as weapons, explosives, or firearms will not be permitted on VKC-PC property or in your possession, while conducting VKC-PC business onsite or offsite, except as otherwise required by applicable law.
- vi. VKC-PC encourages reports of any conduct that appears to be discriminatory, harassing, violent, threatening, or intimidating. If you believe you have been subjected to any discriminatory, harassing, violent, threatening, or intimidating conduct; or you believe certain behavior has the potential to affect the safety of people, property, or has the potential to become violent, you must report the incident immediately to your manager, or the VKC-PC Compliance Office, at compliance@vkc-pc.com. All reported allegations will be investigated promptly, and thoroughly, and kept confidential, to the extent possible. VKC-PC will not retaliate against employees who submit good-faith reports of any conduct that appears to be discriminatory, harassing, violent, threatening, or intimidating. Anyone found to be responsible for any discriminatory, harassing, violent, threatening, or intimidating conduct that is in violation of our Code standards, or company policies, will be subject to prompt disciplinary action, up to and including termination of employment or other remedial actions available under applicable law.

D. Antitrust and Anti-Corruption Laws

- i. VKC-PC complies with applicable local, and foreign, laws regarding customs and trade (where relevant). We will be accurate, and truthful, when representing our business transactions to



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applicable government agencies, where relevant. Any information that we may need to provide to government agents to aid in facilitating imports, and exports, will be accurate and truthful. Employees conducting international business must be aware of the United States' restrictions on trade with foreign entities, in addition to trade restrictions in other countries (where we conduct international business) to ensure appropriate decisions are being made on the company's behalf. Employees, are at no time, permitted to influence the outcome of any business decision by exchanging bribes, or kickbacks, of any kind. If you have concerns about an entity transaction, or require clarification about certain restrictions, you should contact compliance@vkc-pc.com.

- ii. VKC-PC is committed to the highest ethical standards in all our business activities and operations, never through corrupt and unethical business practices. It is our policy to comply with the *U.S. Foreign Corrupt Practices Act ("FCPA")*, the *U.K. Bribery Act*, the *European Union's Fight Against Fraud and Corruption Act*, and any other similar anti-corruption laws where we operate and conduct business (collectively, "Anti-corruption Laws"). You must be mindful of all your business transactions, and never attempt to offer, authorize, or provide any bribe or kickback (directly or indirectly) to foreign officials (i.e., a national or local government official or employee, political candidate, or an official or employee of government-owned or controlled entities) to obtain or retain business, or gain an unfair business advantage. This means no illegal payments, or a gift of any kind, may be made to government officials (from any country) to facilitate a local process or to influence a local government official. Bribes may include a sum of money, or other incentive (e.g., gifts, travel expenses, favors, business opportunities, political or charitable contributions, and hospitality) that persuades a person to act in one's favor, typically amounting to illegal or dishonest behavior.
- iii. No Vendor engagements will be used to support unethical, and illegal, business conduct or practices. In other words, you may not hire a Vendor to make improper payments or provide some other form of a bribe (directly or indirectly). This is not only a violation of Anti-corruption Laws, but also a violation of our Code. VKC-PC's business arrangements may involve working with public and private entities, including healthcare professionals and other healthcare-related entities. We may also interact with regulatory agencies. As such, we must ensure we follow applicable Anti-corruption Laws to avoid inappropriately influencing such entities (or healthcare professionals) that use our services. Any Vendor that conducts business on our behalf must also comply with these requirements.
- iv. Certain Anti-corruption Laws (e.g., the FCPA) allow for "facilitating payments," i.e., a small cash payment used to support expediting standard or routine government services (e.g., processing permits). VKC-PC does not permit such payments to be made. Payments made to any foreign official (by or on VKC-PC's behalf) must be lawful under applicable Anti-corruption Laws, must always be strictly tied to services performed, and must be reasonable in amount given the nature of those services.
- v. If you have any questions about whether a person qualifies as a foreign official, are uncertain if any of your business activities could be construed as bribery, or require further guidance about Anti-corruption Laws, please contact compliance@vkc-pc.com.

E. Political Activity

- i. VKC-PC respects our employees' personal political decisions, including the right to make your own personal political contributions. However, VKC-PC does not participate, nor make, any political contributions to political organizations and candidates. Therefore, no employee may represent, or use, the company's name when engaging in any political activities undertaken during your own



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personal time. This means that you may not use your business email accounts, company funds, or any other company property to support your political activity actions. Doing so, would be a violation of our Code, and company policy, and may result in disciplinary action, up to and including termination.

F. Government Inquiries

- i. VKC-PC's policy is to deal honestly, and fairly, with government authorities and to comply with valid governmental requests and processes (where applicable). Our interactions must be truthful, straightforward, and not false or misleading.
- ii. If you are contacted by a government, or regulatory, representative and asked to provide any Persons' Information, participate in an interview, submit to an inspection, provide access to company property, or have received correspondence from an outside representative (e.g., an attorney), you must contact (and forward any applicable documentation to) the VKC-PC Compliance Office, immediately at: compliance@vkc-pc.com, to ensure that such inquiries, and requests, are responded to in a timely, complete, and accurate manner, in addition to ensuring appropriate steps are taken to satisfy VKC-PC's legal obligations.

G. Gifts and Entertainment

- i. VKC-PC is committed to the highest ethical standards in all our business activities and operations. While gift giving, or business entertainment, may play an important role in facilitating business relationships, the giving, accepting of gifts, and hospitality must never be used to gain an unfair business advantage. Specifically, a gift (or entertainment) should not be accepted (or given) if it might create a sense of obligation, compromise your professional judgment, or create the appearance of doing so. This means that a gift, or entertainment, should never be offered, given, provided, or accepted by any employee, or his or her family members, unless: 1) it **IS NOT** cash; 2) is not excessive in value; 3) is customary as a business courtesy; 4) cannot be seen as a bribe; and 5) does not violate any applicable laws or regulations, such as Anti-corruption Laws.
- ii. As a rule, gifts to (or from) any one Vendor, or other business associate, should be limited to U.S. \$75.00, per year. A gift of nominal value may be given (or accepted) if it is a common business courtesy, such as coffee mugs, pens, or a similar token.
- iii. Employees may offer (or accept) meals and entertainment if they are reasonable and customary, appropriate, occur infrequently, and are not expensive. However, you may not encourage, or solicit, meals or entertainment from anyone with whom VKC-PC does business with or from anyone who desires to do business with VKC-PC. This rule applies to all employees, and their direct families when interacting with any clients, Vendors, healthcare professionals, public/foreign officials, and any other relevant business associates.
- iv. If you have any questions regarding whether a certain gift, or entertainment, is appropriate, you should contact your manager, or the VKC Compliance Office, at: compliance@vkc-pc.com.

H. Conflicts of Interest

- i. We all must avoid conflicts of interest. A conflict of interest exists when a personal interest, or activity, interferes, or appears to interfere, with the duties that you perform at VKC-PC, or conflicts with VKC-PC's best interests. A conflict of interest may unconsciously influence even the most ethical person, and the mere appearance of a conflict, may cause an employee's acts, or integrity, to be questioned. A conflict situation may arise if an employee, or a member of an employee's



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immediate family, is in a position where he or she may gain a personal benefit from a VKC-PC business transaction and such interaction may influence an employee's judgment due to a financial, or other relationship, with a client or Vendor. Some examples include, without limitation:

- a. An employee has a financial interest that could affect his or her personal judgment;
 - b. An employee has a financial gain through access to Information;
 - c. An employee exploits their role at VKC-PC, resulting in a personal gain; or
 - d. A transaction with a person, or entity, in which an employee is recommending, negotiating, or contracting on VKC-PC's behalf is a related party to him or her.
- ii. Because the existence of a conflict of interest is not always clear, they must be reported. If an employee thinks that he or she may have a conflict of interest, or is aware of a potential conflict of interest that other employees may have, the potential conflict must be disclosed to the VKC-PC Compliance Office at: compliance@vkc-pc.com. A determination will be made regarding whether the interest that creates the conflict should be separated or any other action should be taken.

4. Sales and Marketing

Our communications with our clients, or potential clients, must be truthful and accurate. When we say something about our services, we must be able to substantiate it. We sell the quality of what we do. Statements made by us, or on VKC-PC's behalf, including those made in advertising, promotional materials, bids, proposals, and sales presentations must be truthful, based on fact, and not misleading. Any interactions with Persons (e.g., clients, Vendors, and healthcare professionals) must comply with our service offerings. We must ensure we only engage Vendor services when they are legitimately needed, and we must not pay more than an appropriate fair market value for the services rendered.

If you are uncertain as to whether any of your sales or marketing practices are a potential violation of our Code, or company policies, you should contact your manager or the VKC-PC Compliance Office at compliance@vkc-pc.com.

5. Public Relations and Social Media

To ensure continuity, protect our brand and reputation, only a select few VKC-PC employees are authorized to speak on the company's behalf to outside media. If you have not been specifically authorized by VKC-PC to speak to the media, or on VKC-PC's behalf, you must refrain from doing so. Not only would this violate our Code but may subject the company to unnecessary risk. Where any company-owned Information is authorized for release, it must be accurate, complete, consistent, and distributed in accordance with VKC-PC's policies. If someone contacts you from the media (or any other outside representative), be sure to notify the VKC-PC Compliance Office at compliance@vkc-pc.com. Please do not attempt to answer any questions yourself. Someone from the VKC-PC Compliance Office will respond to such inquiry.

When using any form of social media, you should use good judgment and follow all company guidelines. Any form of illegal, or inappropriate, social media use in your role as a VKC-PC director, officer, or employee, including disclosing any Persons' Information or making inappropriate or unlawful comments, may result in disciplinary action, up to and including termination or any other legal remedies available to us. For additional information about appropriate social media use, please refer to the VKC-PC Employee Handbook.

6. Intellectual Property

Our intellectual property, including without limitation: our trademarks; brands; logos; copyrights business ideas; company proprietary Information; inventions; trade secrets; and patents (collectively, "IP") are extremely valuable to our success. As standard, our IP should be kept confidential, in accordance with our Code standards and other company policies. Where employees may be authorized to use our IP, as part of their daily business activities and operations, it must be used carefully and protected from misuse.



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As an employee, the things you create for VKC-PC belong to the company. This includes, without limitation: inventions; discoveries; ideas; improvements; software programs; and works of authorship. This work product is VKC-PC's property if it is created, or developed, in whole or in part, on company time, as part of your job duties or using company resources. You must promptly disclose to us, in writing, any such work product and cooperate with the company's efforts to obtain protection for VKC-PC. To ensure that VKC-PC's IP is appropriately protected and receives the benefit of work done by its Vendors, it is essential that an appropriate written agreement (or release) be in place before any work begins. You should never allow a Vendor to use our IP without proper authorization, and a license agreement, that has been approved by VKC-PC's President.

If VKC-PC is authorized to use the work product (or intellectual property) of others, we must also be sure to follow the applicable guidelines. VKC-PC does not permit, or tolerate, the unauthorized reproduction of a Vendor's copyrighted materials or any other infringement of their intellectual property rights. For example, you should only use software for which you have a valid license and should only use that software per the terms of the applicable software license. You are not permitted to copy, or use, software (or licensed information) except as permitted in the applicable license agreement.

7. Company Books and Records

It is VKC-PC's policy to comply with applicable laws and regulations that govern our books and records' transactions, ensuring such transactions are represented legitimately, accurately, and concisely. These requirements extend to records maintained in all forms, both electronic and paper. Company records include, without limitation: payroll; timecards (where applicable); travel and expense documents (where applicable); emails; accounting and financial data; performance records (where applicable); contracts; project information; and any other records maintained in the ordinary course of business.

Company records must be prepared accurately, and reliably, and stored properly in accordance with applicable company policies and statutory record retention requirements. Additionally, our records must accurately and fairly reflect, within VKC-PC's normal accounting and reporting systems, all required transactions and other events. There may not be any unrecorded company funds, assets, or any other "off-the-books" accounts, no matter what the reason for such accounts. Our records must not contain information that is misleading, incomplete, inaccurate, fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, abusive, libelous, defamatory, or that violates applicable laws or regulations. If you have reason to believe that any of our books, and records, are being maintained in a materially inaccurate (or incomplete) manner, you must report this immediately to the VKC-PC Compliance Office at compliance@vkc-pc.com.

You **MUST NOT** knowingly destroy (or discard) any Information, or company records, that are subject to a legal hold. Information, or records, relevant to a legal action cannot be destroyed, or discarded, and must be preserved, unless authorized, in writing, by VKC-PC's Compliance Office. If we receive a subpoena, a litigation hold, a request for Information or records, or other legal documents; or if we have reason to believe that such a request, or demand, is likely, our policy is to retain all Information, and records, that are relevant to the matter. If you receive such a request, or other legal documentation, you must notify the VKC-PC Compliance Office, immediately at: compliance@vkc-pc.com.

8. Investigations and Remediation

Your questions, Code reporting violations, and other compliance, or ethics,' issues will be taken seriously and handled promptly, and confidentially, subject to the requirements under applicable laws and regulations, our Model requirements, and the relevant investigation. We recommend you share your questions (or concerns) with your manager. However, if you are not comfortable speaking with your manager, or unsatisfied with the manager's response, you may contact the VKC-PC Compliance Office at: compliance@vkc-pc.com, at any time. If you are a



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member of the VKC-PC Board of Directors, you should discuss a possible violation with the President/Owner (or designee).

If you believe you, or another employee, may have violated our Code, or an applicable law or regulation, it is your responsibility to, immediately, report the violation to your manager or the VKC-PC Compliance Office. If you are a manager and you have received information from an employee about a potential Code violation, or other unethical or illegal conduct, you must notify the VKC-PC Compliance Office, immediately, at: compliance@vkc-pc.com. We do not condone, nor will we retaliate against any person who, in good faith, makes a complaint submission about any accounting, auditing, Model violation, retaliation, or any other illegal or unethical conduct. Any form of retaliation, by an employee, may be grounds for possible employment termination.

Employees may submit reports via mail, courier service (e.g., FedEx), email, or in person. You may submit complaints (or concerns) confidentially and anonymously. If you wish to make a report anonymous, you should type the report, include the date, but **DO NOT** include your name, and deliver it via mail, or courier service (to our corporate headquarters in Waltham, MA) in an envelope marked “**CONFIDENTIAL.**” Alternatively, you may also submit an anonymous report by email; to do so, you should be sure to send the report from an email address that does not identify you (e.g., reporter@gmail.com).

Upon receipt of a complaint, including any Model violations, we will promptly investigate the complaint and will involve applicable external resources, and other legal and regulatory parties (where required), if such outside involvement appears advisable or necessary. We will exercise confidentiality discretion based on the sensitivity of the complaint report (and the various investigation requirements needed) to support a thorough investigation and response. **Any Model violations, including any suspected information misuse or disclosure, must be reported, in accordance with the requirements under Section 3(A)(vi) – Data Protection and Confidentiality above.**

VKC-PC’s Compliance Office is responsible for overseeing any formal investigation required. You are expected to cooperate with an investigation, refrain from interfering with an investigation, avoid misrepresenting facts relevant to an investigation, and not attempt to discover the identity of anyone related to the matter under investigation. Review of the complaint findings will determine what remediation actions are required. For example, an investigation involving a potential Model violation, or data breach, would determine whether an actual violation occurred; the overall severity of the relevant violation; whether notification is required to the affected parties involved, whether regulatory agencies need to be notified; whether the media needs to be notified; what remediation actions may be needed; and any other obligations required under our Model requirements and applicable data privacy, and cybersecurity, legislation. It is important to note that not all reported complaints may rise to the level of an actual violation or misconduct, which is why it is critical that you follow the reporting procedures, identified above, to ensure an appropriate investigation may be performed.

9. Environment, Substance Abuse, and Health and Safety

We all need to do our part to find ways to proactively address the environmental impacts of our business activities, and operations, to ensure compliance with applicable environmental laws and regulations. This means we need to consider “green” practices, which will aid in minimizing any negative environmental impact from our business activities and operations. We are committed to contributing positively to the environment and being part of the solution.

Substance abuse may affect the health, safety, and security of our employees, affect our ability to perform our job duties, and may damage our reputation with our clients and Vendors. As such, you are not permitted to use, possess, sell, purchase, distribute, manufacture, or transfer alcohol, and illegal drugs, while on company property. You also may not report to work under the influence of alcohol or illegal drugs. Please refer to the VKC-PC Employee Handbook for further information.



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We are committed to providing a safe, and healthy, work environment and meet applicable health and safety laws. Maintaining a safe and healthy work environment relies heavily on our business practices. Each of us must be aware of our policies that apply to our workplace, diligently follow those guidelines, and encourage others to do the same. If you become aware of an unsafe, or unhealthy, work environment, you must report the matter, promptly, to your manager or to the VKC-PC Compliance Office at: compliance@vkc-pc.com.

10. Code Changes

We may change our Code from time-to-time to ensure its current and account for any applicable legal and regulatory changes. All of us are responsible for staying abreast of any Code changes and periodically review the document to ensure awareness of any modifications. Any material Code changes must be approved by our VKC-PC Compliance Office.

This Code, and the guidelines outlined herein, do not represent an employment contract. VKC-PC reserves the right to amend, supplement, or discontinue this Code, without prior notice, at any time. Material Code changes will be provided to you through our document management system.

11. Revision History

Revision Date	Author	Changes
3JAN2023	Veronica Contreras	New Business Code of Ethics
30OCT2024	Veronica Contreras	Added new section on AI ethical use and reviewed Code content to ensure it is current and aligns with VKC-PC's policies, procedures, and best practices.