

We conduct business in a manner that supports fair and open competition, with transparent business practices that comply with competition laws in the markets in which we participate.

At Inizio our success and relationships are built on exceeding expectations. We always compete fairly and lawfully in doing so. Inizio does not enter into any agreements that could restrict, prevent, or distort competition.

Our Codes and Commitments empower everyone who works with us to do the right thing. If a situation or circumstance involving competitors appears abnormal, we are obliged to Speak Up through numerous channels without fear of retaliation or retribution...working as one.

Our Policy & Its Scope

Aim of this policy

The aim of this policy is to establish our position pertaining to antitrust and competition law and to inform those who work with Inizio of the actions they should take to help us abide by applicable laws and regulations.

Scope of this policy

Inizio's Competition Law Policy applies and pertains to:

- All Inizio locations, divisions, businesses, and affiliates, and

- All employees, contingent workers, contractors, and anyone who is engaged in activities acting on behalf of Inizio.

Importantly, anyone engaging with clients, suppliers, contractors, and business partners on behalf of Inizio should communicate this policy and our Codes as such relationships commence, and as appropriate thereafter.

Those who work with and for us should familiarize themselves with the following requirements pertaining to bidding processes, competitor contacts, sensitive commercial information and what you should know and do if you have questions or concerns pertaining to such.

Legal requirements and local-level obligations

The US Sherman, Federal Trade Commission, and Clayton Acts, together with Articles 101 to 109 of the Treaty on the Functioning of the European Union and related legislation in these jurisdictions and elsewhere provide the foundations for this policy.

Specific local obligations may also be relevant to discrete Inizio businesses. If conflicting, local legal obligations always take precedence over this policy and its associated processes.

Group Legal & Compliance

Inizio's Legal and Compliance functions will:

- Contribute to periodic risk and control assessments, identifying if and where competition-related risks are concentrated and how sufficiently they are controlled,
- Administer Inizio policies, processes and training which effectively manage and mitigate competition risks,
- Assist Inizio businesses as required with competitor contact and bidding process guidance, and other competition law-related queries, and;
- Review, ascertain and facilitate any reporting requirements or approvals associated with mergers, acquisitions, or joint ventures.

Our People Interacting with Clients & Competitors

Inizio's leaders, managers and others who interact with our clients and competitors will:

- Foster a culture of fair competition where Inizio wins opportunities and strengthens relationships on merit,
- Participate in bidding processes transparently and without competitor engagement,
- Avoid contacts with competitors that could create even the appearance of improper agreements or collusion, particularly at trade events and informal and social gatherings,
- Never exchange information with a competitor about prices, costs, profits, rates, contractual or bid terms, charges, commissions, or discounts applicable to current or future clients, contractors or suppliers, or the allocation of work, markets, territories, or clients, and;
- Contact Legal *in advance of* competitor contacts if you have questions or concerns pertaining to such.

All Inizio Personnel

Every Inizio employee and other personnel working with us will:

- Comply with all applicable competition laws, regulations, and orders,
- Understand and abide by this policy and any business-specific guidelines which pertain to competitor contacts, trade and professional association participation, bidding processes or other requirements pertaining to fair competition,
- Speak Up without fear of reprisal through our numerous channels if a competition-related matter doesn't feel right or is clearly wrong, and;
- Complete any assigned competition, conflict of interest, or other mandatory compliance training in a timely manner.

This policy, together with our Codes and Commitments, and other related policies and processes form Inizio's Competition Law framework. Please contact compliance@inizio.health with any questions pertaining to the specifics of this policy or our framework.