

CODE OF CONDUCT AND ETHICS



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A MESSAGE FROM THE BOARD

Dear Colleagues:

At American Oncology Network, Inc. (AON) we treat the most challenged patients. They often come to us in dire circumstances, hoping for success but also looking to be treated with dignity and respect.

Every person we employ or contract with is vital to our organization and has a role to play if we are going to be successful and deliver the care and compassion that we and our patients rightfully expect. The best way we can ensure such outcomes is to follow all relevant laws, rules and regulations that govern the care we provide and the operation of our business. To that end we have a Corporate Compliance Program that emphasizes the need to adhere to the rules and helps us in resolving issues, problems or questions that arise.

This Code of Conduct and Ethics (the “Code”), as updated and amended from time to time, describes the standards and fundamental rules of ethical business practice that guide our operations. It derives from our Vision and Values, and affirms the principles and professional standards that exist among our employees and colleagues. We are committed to following the Code because it’s what’s best for our patients and best for AON, especially given the challenges of the current healthcare environment.

We expect the following:

1. Everyone associated with AON should know, understand, and follow the laws, rules, and regulations that govern us, especially those relevant to each person’s job functions.
2. If any person suspects or is aware of a problem or violation, he/she has an affirmative duty to report it either to management or the Compliance Office. Issues involving a person who is not a director or executive officer will be addressed and resolved by management in conjunction with the Compliance Officer. Where the suspected violation involves a person who is a director or executive officer, the issue will be addressed by the audit committee. Failure to report can result in disciplinary action up to and including termination.
3. The Company does not tolerate acts of retaliation against any director, officer or employee who makes a good faith report of known or suspected acts of misconduct or other violations of this Code.
4. Issues and problems that arise will be addressed promptly and effectively.

We have established the Compliance Office to support and oversee our Compliance Program. Please contact compliance@aoncology.com with any inquires. In addition, to report a concern on a confidential or anonymous basis you may utilize the Compliance Helpline. The **Helpline** phone number is 844-743-1367 and the internet address is www.AONHelpline.Ethicspoint.com.

We pledge our full commitment to upholding the Code and implementing an effective Compliance Program. We require everyone’s help if we are going to be successful.

Sincerely,
American Oncology Network, Inc.

HELPLINE: Report Anonymously



HELPLINE

**CONTACT THE HELPLINE
FOR ANY CONCERNS
ABOUT THE FOLLOWING:**

Employee Relations – Human Resources

Lost or Stolen Equipment – IT Security

Fraud, Waste or Abuse – Compliance

Patient Health Information – HIPAA

**SUBMIT YOUR REPORT ONLINE:
AONHelpline.Ethicspoint.com**

You May Remain Anonymous

(844) 743-1367



INTRODUCTION TO THE CODE OF CONDUCT AND ETHICS



This Code of Conduct and Ethics (the “Code”), as well as all statutes, regulations, guidelines, and policies and procedures of AON Oncology Network, Inc. (the “Company”) should be observed by everyone in the Company’s work environment including those acting on behalf of the Company. References to “our”, “us”, or “we” include the Company, its directors, officers and/or employees. No one, regardless of position, will be allowed to compromise adherence to the Code as well as relevant laws, regulations, business standards, policies, or procedures. Failure to comply with the Code or any applicable laws, regulations, policies and procedures can directly impact our ability to care for our patients and to operate in accordance with our mission and values.

The Code, adopted by the Company’s Board of Directors (the “Board”), is intended to ensure that we meet our compliance goals in today’s highly regulated health care and business environment. More detailed information is contained in our policies and procedures. The Code is a “living document,” which may be updated periodically by the Board to respond to changing conditions. Any amendment or waiver of the Code for a director, executive officer or any financial or accounting officer at the level of the principal accounting officer or controller or above, may be made only by the Board, and must be promptly disclosed to stockholders. Waivers with respect to other employees or applicable contractors may be made only by the Company’s Chief Compliance Officer. Any waiver of this Code of Conduct with respect to a conflict of interest transaction required to be disclosed pursuant to Item 404 of Regulation S-K promulgated under the Securities Act of 1933, as amended, must be approved in advance by the Board, upon recommendation of the Audit Committee.

If you have any questions about the Code or about any policies or practices of AON, you can convey them to AON management or the Compliance Office.

PRINCIPLE 1

QUALITY OF CARE

We are committed to providing high quality care and services. Our first responsibility is to our patients and their families.

- ◆ We strive to provide the highest level of care to our patients.
- ◆ We will provide quality care and services consistent with a philosophy that all aspects of patient care are to be given the appropriate attention and dedication.
- ◆ We will treat every patient with dignity, respect, and compassion at all times.
- ◆ We will respond to patient questions, concerns, and needs in a timely and sensitive manner.
- ◆ We will not discriminate against any patient for any reason including race, sex, sexual orientation, gender, national origin, age, disability, or any other classification protected by law.
- ◆ We verify that all staff are properly credentialed and qualified for the functions and duties they perform.
- ◆ We will follow all applicable laws and regulations regarding patient rights, the provision of medical services, the prescribing of all medications, and the overall operation of our business.
- ◆ We report errors and near misses timely and appropriately and seek to rectify any medical errors for optimal patient recovery.
- ◆ We will maintain the confidentiality of patient health information in accordance with established laws, regulations and professional standards and expectations.
- ◆ We will ensure that confidential patient information is accessible only to health care personnel involved in the patient's care and others authorized to access and use it.
- ◆ We will strive to ensure that complete and accurate patient medical records are maintained in accordance with Federal and State requirements.
- ◆ We strive for innovation and continuous quality improvement.
- ◆ We are committed to being involved in the latest clinical research in order to find new and better treatments for our patients.

PRINCIPLE 2

COMPLIANCE WITH LAWS AND REGULATIONS

We are committed to high standards of business and professional ethics and integrity. We will provide patient care and conduct business while following all applicable laws, regulations, and policies.

- ◆ We will promptly report to Management, the Compliance Officer, the audit committee or the Compliance Hotline whenever a possible violation of law, regulation, or policy has occurred.
- ◆ We will verify that all compliance issues or reported concerns are promptly acted upon and in a responsive, fair and truthful manner.
- ◆ We will not tolerate any retaliation or other negative action(s) against an director, officer or employee for reporting in good faith a suspected violation or concern.
- ◆ We will not offer, provide, solicit, or accept kickbacks, bribes, rebates, or anything of value in return for or in order to induce the referral of patients and services or influence our business, clinical or strategic decisions.
- ◆ We will maintain a high level of integrity in business conduct and take steps to avoid potential conflicts of interest or other activities that may reflect negatively upon our integrity.
- ◆ We will require all workforce members (including physician staff) to timely complete initial and annual Compliance Program and HIPAA training and education.
- ◆ We will ensure that all records, reports, statements, communications, and representations are accurate, complete, and truthful and comply with applicable laws and regulations.
- ◆ We expect all employees and contractors to be familiar with the Code as well as applicable laws, regulations, and policies governing their area of work.
- ◆ We will ensure that all agreements with an individual or organization that may be a referral source or generate referrals are in writing and approved by appropriate management and legal counsel prior to execution.
- ◆ We will not hire or contract with individuals or entities that have been sanctioned (excluded from participation in Federal health care programs) by the Office of Inspector General (OIG) of the U.S. Department of Health and Human Services), or barred from a state health care program.
- ◆ No director, officer or employee may purchase or sell any Company securities while in possession of material nonpublic information regarding the Company, nor may any director, officer or employee purchase or sell another company's securities while in possession of material nonpublic information regarding that company. It is against Company policy and illegal for any director, officer or employee to use material nonpublic information to obtain profit for himself or herself or directly or indirectly "tip" others who might make an investment decision on the basis of that information.

PRINCIPLE 3

WORK PLACE INTEGRITY

We recognize that our employees are our most valuable asset. We are committed to creating a work place where employees are treated with respect and fairness while being empowered to get the job done at or above expectations.

- ◆ We will maintain a work environment that is free from harassment and intimidation. We will not tolerate unprofessional behavior, including behavior based on an individual's race, gender, national origin, color, disability, sexual orientation, or any other classification protected by the law.
- ◆ We will make all employment and promotion decisions without regard to race, color, sex, national origin, alienage, age, disability, or any other classification protected by law.
- ◆ We will continually strive to build confidence and professionalism in every employee.
- ◆ We will maintain open lines of communication so that the views of each employee may be considered and their opinions given proper respect.
- ◆ We will show respect and consideration for one another, regardless of status or position.
- ◆ We will apply the *Code of Conduct and Ethics* and personnel policies fairly and consistently to all employees.
- ◆ We are expected to perform our job responsibilities to the best of our abilities.
- ◆ We will provide reasonable training opportunities to assist employees in building and maintaining their professional skills, knowledge and education.
- ◆ We will work collaboratively to help create and sustain a culture of teamwork, individual superior performance and service, and operational excellence.
- ◆ We are committed to maintaining a work place that protects the health and safety of our patients and employees. We will report to appropriate management any workplace health or safety concern or any practice that may violate a safety standard.
- ◆ We will not tolerate any work place violence, including threats, harassment, or bullying. Possession of weapons in the workplace is prohibited unless required by the employees' job description.
- ◆ We recognize that the manufacture, sale, possession, distribution, or use of illegal drugs at work is not permitted.
- ◆ We will comply with the Federal, State, and local laws, regulations, and rules that apply to workplace safety and our workforce.

PRINCIPLE 4

BILLING AND CODING PRACTICES

We shall promote the preparation and maintenance of timely and accurate patient records and billing for rendered services.

- ◆ We will require the correct coding and billing for services as provided and documented in the patient’s medical record.
- ◆ We will use our best efforts to ensure that claims submitted for payment are accurate, and properly coded, documented, and billed in accordance with all applicable laws, regulations and payor requirements.
- ◆ We will not knowingly submit, or cause to be submitted, for payment or reimbursement a claim we know to be false, fraudulent, or fictitious.
- ◆ We will regularly review bills, reimbursement, and medical records to verify compliance with applicable billing, coding, and documentation requirements.
- ◆ We will regularly review records relating to credit balances, correct any errors in billing, and promptly refund overpayments if applicable in accordance with established rules, laws and regulations.
- ◆ We will not routinely waive third party payer patient cost-sharing, (e.g., deductibles and co-payments) in violation of applicable laws or regulations.
- ◆ We will respond to all questions and complaints related to a patient’s bill in a timely, direct and honest manner.
- ◆ We will protect confidential practitioner information and not use or reveal such information except in the proper performance of duties.
- ◆ We will require medical documentation and billing records maintenance in a manner consistent with applicable laws and regulations.
- ◆ We will inform and work diligently with third party payers (or patients) to correct any errors in billing, and the refunding of any money received but not due, as inaccuracies are found.
- ◆ We will report and refund any identified overpayments in accordance with applicable laws and regulations.
- ◆ We will not alter or destroy any document in response to, or in anticipation of, a request by any government agency or court.
- ◆ We will not knowingly falsify or omit information provided on applications for credentialing, licensure or membership to health plans, hospitals, licensure boards and/or government agencies.

PRINCIPLE 5

PROTECTION AND USE OF INFORMATION, PROPERTY, AND ASSETS

We are committed to protecting AON's property and information against loss, theft, destruction, and misuse.

- ◆ We will correctly use and care for all property and equipment entrusted to us.
- ◆ We will institute appropriate internal controls to protect AON assets.
- ◆ We will protect confidential company information, including protected health information (PHI) as defined by HIPAA, and not use or reveal such information except in the proper performance of duties and in accordance with applicable laws, regulations and AON policy.
- ◆ We will appropriately maintain and inventory supplies and fixed assets and keep them secure.
- ◆ We will not make unauthorized copies of computer software or use unauthorized personal software on AON's computer equipment.
- ◆ We will not communicate or transfer any information or documents to any unauthorized persons or entities.
- ◆ We will honor the privacy of patients and not reveal or discuss patient-related information except with health care personnel involved in the patient's care, payment of services, or other reasons directly related to care or payment or otherwise in accordance with applicable laws, regulations and AON policy.
- ◆ We will not use computers, software, e-mail, facsimile machines, and other technology to communicate information to unauthorized people. Further, the use of technology to send offensive, discriminatory, or harassing messages is prohibited.
- ◆ We will safeguard the access, use and disclosure of protected health information, including information related to treatment, medical history, current health status, payment for treatment and other information contained in patient records, in accordance with the Health Insurance Portability and Accountability Act (HIPAA) privacy and security regulations, state law, and AON's policies and procedures.
- ◆ The obligation to protect AON's assets includes the AON's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any nonpublic financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

PRINCIPLE 6

CONFLICTS OF INTEREST

We are committed to acting in good faith in all aspects of our work. We will avoid conflicts of interest or the appearance of conflicts between the private interests of any employee and his or her work duties.

- ◆ We will devote our full time and ability to AON during our hours of work.
- ◆ We will maintain unbiased relationships with actual and potential vendors and contractors.
- ◆ We will exercise good faith and fair dealing in all transactions that involve our responsibilities to AON.
- ◆ We will refrain from and avoid conflicts or the appearance of impropriety between our private interests and our responsibilities in performance of our duties.
- ◆ We will not abuse or misuse our position for personal or improper gain.
- ◆ We will not engage in any activity, practice, or act that creates an actual or apparent conflict of interest with AON or its affiliates.
- ◆ We will not offer, accept, solicit or provide gifts or favors, such as meals, transportation, or entertainment that might be interpreted as an improper or illegal attempt to influence a business or clinical decision relating to AON.
- ◆ We will not accept a gift that exceeds courtesy value and never accept cash or cash equivalents as gifts from vendors, patients, clients, or customers other than for fundraising activities related to the AON Foundation or other charitable organizations.
- ◆ We will report actual or perceived conflicts to AON management and the Compliance Officer.
- ◆ We will not accept outside employment that conflicts with our positions without making it known in advance to our manager.
- ◆ We will not hire or have an AON-related business relationship with a relative without making it known in advance to our manager, Human Resources and/or the Compliance Officer.
- ◆ We will not become involved, directly or indirectly, in outside commercial interests that could improperly influence our actions in the performance of our duties and responsibilities to AON.
- ◆ Loans by the Company to, or guarantees by the Company of obligations of, any director or executive officer or their family members are expressly prohibited.

PRINCIPLE 7

NON-RETALIATION AND DUTY TO REPORT

We will report concerns about actual or potential wrongdoing without the fear of retaliation.

AON has adopted a Non-Retaliation Policy to protect employees who report their concerns. No disciplinary action or retaliation will be taken when you report in good faith a perceived issue, problem, concern, or violation. We value and respect the dignity of the individual; therefore, you have the right to be treated fairly and with the proper consideration and respect.

AON Encourages employees to report concerns. You may report as follows:

1. Discuss the question or concern with your direct supervisor. Your direct supervisor is most familiar with the laws, regulations, and policies that relate to your work.
2. If you are not comfortable with talking to your supervisor, or you feel you did not receive an adequate response, contact your supervisor's manager or another member of the management team. You may also contact the Human Resources Office.
3. Contact the **Corporate Compliance Officer**:

Kristin.Matisziw@aoncology.com

PRINCIPLE 8

COMPLIANCE RESPONSIBILITIES

RESPONSIBILITY OF EMPLOYEES

All employees are expected to follow all applicable laws, regulations, and policies. Anyone who knows about or suspects a violation must report this information. If you do not report a violation, you may be subject to disciplinary action even if you were not directly involved. Reporting does not protect you from disciplinary action regarding your own performance or conduct, but your honesty and timeliness will be considered.

RESPONSIBILITY OF MANAGEMENT

Management is expected to demonstrate a commitment to ethical and legal behavior that is consistent with AON's mission and the Compliance Program. Management is responsible for maintaining a work place environment that stresses commitment to compliance with the *Code of Conduct and Ethics* and with laws and regulations, and that prevents retaliation or reprisals against employees who report actual or suspected compliance violations. A supervisor or office manager has an obligation to ensure that employees:

- ◆ Are comfortable asking questions and raising legitimate issues of concern;
- ◆ Receive, read, and understand the Code;
- ◆ Understand their affirmative duty to report actual or suspected violations of the Code;
- ◆ Know about and follow all laws, regulations, and policies within the scope of their responsibilities;
- ◆ Know the procedures for reporting suspected or actual violations; and
- ◆ Encourage others to ask questions and to report actual or suspected violations.

If an employee comes to a manager with a question regarding compliance with a law, regulation, or policy, that manager is responsible for:

- ◆ Taking steps to ensure the employee feels comfortable coming forward and does not fear or experience retaliation;
- ◆ Maintaining the employee's confidentiality;
- ◆ Collecting accurate information regarding the employee's report;
- ◆ Pursuing the right process so that reports of violations or suspected violations can be further investigated; and informing the employee that you have followed through on his or her report.

PRINCIPLE 9

FULL AND FAIR DISCLOSURE

RESPONSIBILITY OF EMPLOYEES

It is AON's policy to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws, rules and regulations in all reports and documents AON files with, or submits to, the Securities and Exchange Commission and in all other public communications made by AON. Officers are required to promote compliance with this policy and Officers and employees are required to abide by company standards, policies and procedures designed to promote compliance with this policy. To ensure the Company meets this standard:

- ◆ Employees (to the extent they are involved in the Company's disclosure process) are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to the Company and commensurate with their duties.
- ◆ Employees are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material facts about the Company to others, including the Company's independent auditors, governmental regulators and self-regulatory organizations.
- ◆ Employees must record the Company's financial activities in compliance with all applicable laws and accounting practices. Employees should be on guard for, and promptly report, evidence of improper financial reporting. Examples of suspicious activities that should be reported include:
 - ◆ Financial results that seem inconsistent with the performance of underlying business transactions;
 - ◆ Inaccurate company records, such as overstated expense reports, or erroneous time sheets or invoices;
 - ◆ Transactions that do not seem to have a good business purpose; and,
 - ◆ Requests to circumvent ordinary review and approval procedures.

All employees are expected to follow all applicable laws, regulations, and policies. Anyone who knows about or suspects a violation must report this information. If you do not report a violation, you may be subject to disciplinary action even if you were not directly involved. Reporting does not protect you from disciplinary action regarding your own performance or conduct, but your honesty and timeliness will be considered.