



Streamline Health Code of Business Conduct and Ethics

Latest update: 05/2021

A Message To All Streamline Health Associates:

Streamline Health's values guide our strategic thinking and tactical actions. We respect our stakeholders and value the relationships we have – with our customers, our investors, our shareholders, our communities and with each other. Every organization needs guiding principles to empower each person to decide what is in the best interest of the company. We look to our **core values** to guide us in each decision we make.

Customer-Centric: we work every day to delight our customers and through innovation anticipate their future needs.

Service Oriented: we are dedicated to serving our Customers, each other and our Communities.

Taking Initiative: we are empowered to act and take responsibility.

Transparent: we value open and honest communication everywhere.

Our core values serve as our general principles in conducting business with the highest integrity and the highest ethical standards. Our core values reflect Streamline Health's culture guide our day-to-day actions with customers and colleagues.

Streamline Health's Code of Business Conduct and Ethics and related policies provide important guidance to conduct our daily affairs and live our core values as we conduct business. They apply to all associates, directors and other personnel engaged by Streamline Health. As a team, we have worked very hard to build a successful and well-respected company. We cannot - and will not - tolerate unethical or inappropriate behavior.

Remember, if you have a question or concern about proper conduct for you or anyone else or believe a violation has occurred, you may always talk to your supervisor, any of our senior management team or any member of our Human Resources team. You may also report possible violations through our Incident Reporting system.

Now more than ever, building a great company requires an unwavering commitment to the highest ethical standards. Each of us is accountable to do the right thing.

Table of Contents

UNDERSTANDING AND APPLYING THE CODE	5
The Goal of the Code	5
Applicability of the Code	5
The Spirit of the Code - Making Good Decisions	6
Statement on Personal Responsibility	6
Limitations of the Code and Your Rights	6
VIOLATIONS OF THE CODE	7
Consequences of Code Violations	7
Reporting Concerns or Violations	7
Assisting with Investigations	7
Commitment to Non-Retaliation and Respect During Investigations	8
Waivers of Obligations Under the Code	8
CREATING A SAFE AND PRODUCTIVE WORK ENVIRONMENT	9
Maintaining a Respectful Work Environment	9
Workplace Safety and Violence Prevention	10
Substance Abuse	10
PROTECTING SENSITIVE INFORMATION	10
Handling Proprietary and Confidential Information	10
Handling Protected Health Information and Other Identifiable Information	12
Disclosure of Material Company Information (“Insider Information”)	12
Information Retention and Destruction	12
Protecting Company Intellectual Property	12
Respecting Third Party Intellectual Property Rights/Infringement	13
Privacy for the Personal Information of our Personnel	14
USING COMPANY RESOURCES / INFORMATION SECURITY	15
Authorized Use of Company Resources	15
Information Security	15
Responsible Use of Company Resources	15
COMPLIANCE WITH LAWS AND REGULATIONS	16
Personal Compliance Obligations	16
Legal and Regulatory Investigations and Communication	16
Statement on Insider Trading and Information Disclosure Laws	16
Statement on HIPAA and Privacy Laws	17

Statement on Antitrust and Fair Competition Laws.....	17
Statement on Anti-Money Laundering and Other Fraudulent Transaction Laws	17
Statement on Anti-Corruption / Anti-Bribery / Anti-Kickback Laws	18
Statement on Trade Laws (Export/Import Control)	19
Statement on Government Customers/Contracting	19
AUTHORIZED REPRESENTATION OF THE COMPANY	20
Honest Advertising and Marketing.....	20
Representative Authority	20
Communicating with Media, Investors and Other External Parties	21
Use of Company Financial Accounts and Funds	21
MAINTAINING COMPANY RECORDS.....	22
Accurate Financial Records / Internal Accounting Controls	22
Participation in Audits.....	23
Intentional or Negligent Financial Record Keeping.....	23
Managing Records Properly.....	23
CORPORATE RESPONSIBILITY	24
Avoiding Conflicts of Interest.....	24
Political Activities and Contributions.....	25
Charitable Contributions.....	25
Obtaining Competitive Information Fairly.....	25
Human Rights	25
Environmental Stewardship.....	26
Gifts and Entertainment.....	26
Commitment to Fair Purchasing	26

UNDERSTANDING AND APPLYING THE CODE

Streamline Health, including all of its subsidiaries and affiliated companies (which may be referred to, collectively, as “Streamline Health” or the “Company” in this document), is built upon a foundation of strong corporate values and business practices. We are committed to maintaining the highest standards of business conduct and ethics. These standards represent the core of how we create the solid foundation of trust and success that is reflected in our relationships with customers, suppliers, shareholders and each other. In turn, this allows us to best serve our customers and shareholders and engage individuals with personal standards consistent with that of our Company standards: integrity, professionalism and commitment to superior results. The Streamline Health Code of Business Conduct and Ethics (or the “Code”) is a key tool we use to support these commitments.

The Goal of the Code

The Code is meant to provide the basic foundation of Streamline Health’s expectations for ethical and appropriate conduct by our personnel. The Code guides daily behavior in achieving the following goals:

- Deter wrongdoing and inappropriate conduct, promote honest and ethical conduct and relationships without conflicts of interest;
- Require full, fair, accurate, timely, and understandable disclosure in our records, reporting and public communications;
- Ensure compliance with applicable laws, rules, and regulations;
- Require prompt internal reporting of violations of the Code; and
- Establish accountability for adherence to the Code.

Applicability of the Code

All members of the Streamline Health personnel team are expected to fully understand and comply with both the letter and the spirit of our Code as well as all other applicable policies, laws and regulations that apply to a particular role. This includes all members of the Board of Directors of any Streamline Health company, all employees of any Streamline Health company and all contractors, consultants, and anyone we authorize to act on Streamline Health’s behalf.

References in the Code to “associates” are intended to address employees, officers and, as applicable, directors. References to “personnel” includes all associates as well as our contractor personnel and similar personnel engaged in performing services with/for the Company or otherwise playing a role in the Company’s operations that may relate to the expectations defined in the Code.

For our vendors, the Company understands that the scope of these obligations may vary company-to-company. However, the Company expects our vendors who supply us with personnel and otherwise are part of providing our products and services to abide by the Code and have policies and procedures in place to accomplish the same.

The Spirit of the Code - Making Good Decisions

The Code is meant as a guide, showcasing the spirit of conduct the Company expects. While details are included at times, the Code is not (and cannot be) a comprehensive rulebook that covers every situation people may encounter. We all must apply common sense, together with the expectations in other Company policies and our own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code.

To help with this, before taking any action, you should consider the following questions. If cover up, “turning a blind eye” or similar activity is required for a “yes” answer, that is not appropriate conduct.

1. Is this action legal, ethical, and socially responsible?
2. Does this action comply with both the spirit and the letter of our Code and related policies?
3. Will this action be and appear appropriate?
4. Would our Company be potentially embarrassed or compromised if this action were to become known within our Company or publicly?

Statement on Personal Responsibility

As members of Streamline Health’s team, we all have a personal responsibility to uphold and ensure the letter and spirit of the Code in our roles every day. Officers, managers and supervisors, by virtue of their positions, must take extra care to be ethical role models and exemplify our corporate values. All leaders are expected to develop a sense of commitment to the spirit, as well as the letter, of the Code in all personnel with whom they interact.

Periodically, you may also be asked to provide a written certification that you have reviewed and understand the Code, comply with its standards, and are not personally aware of any violations of the Code by others. These certifications are a key part of the Company’s internal and external obligations relating to ethical conduct.

We also have a personal responsibility to ask if we are uncertain how the Code may apply in a given situation. Always feel free to reach out. Being open and available for these questions is a key obligation for all Company leadership and the Company’s Human Resources teams

Limitations of the Code and Your Rights

Some parts of the Code may discuss restrictions on communication (internal or external) or similar activities, such as disclosing information, interacting with persons or entities outside of Streamline Health and similar scenarios. Please note that these are not intended to restrict your right to properly participate in any protected activities, including legal or regulatory investigations, cooperating with legal or regulatory authorities, reporting corporate illegal or unethical actions and other such “whistleblowing” or lawful concerted action by employees. Also, nothing in the Code is intended to require you to violate any law, rule or regulation. We may reference this “Your Rights” section in other provisions of the Code, but all provisions of the Code should be understood in this way – even if it is not mentioned. We ask all personnel to reasonably cooperate with the Company in the event this occurs. But, exercising your own rights and/or legal or regulatory obligations will not be deemed a violation of the Code or improper retaliation or action.

VIOLATIONS OF THE CODE

Violations of the Code will not be tolerated at any level of the Company. Violations of the Code are a serious matter that put the violator, fellow personnel and our Company at risk. Ensuring violations are properly reported and investigated is also a key aspect of the Code. You should never hesitate to ask questions about whether any conduct may violate the Code, voice concerns, or clarify gray areas. Taking a proactive approach is the best way to prevent a violation. This section defines the requirements for personnel in the event violations (or potential violations) occur.

Consequences of Code Violations

Violations have consequences. Any personnel who violates the standards in the Code will be subject to appropriate disciplinary and other corrective action based on the associated facts. Depending on the nature of the violation and the associated circumstances, this may range from a warning or reprimand to modifications of their role, including termination of engagement, to, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution. Again, this applies for all personnel, regardless of role or title.

Based on the completed investigation, Streamline Health may also, in appropriate cases and in accordance with applicable law, notify government authorities of any associated criminal or regulatory compliance violations and cooperate with any resulting investigations, prosecution or other government actions or proceedings. This determination of whether and when to refer a matter to government authorities will be made by Streamline Health's executive management team with the guidance of the Company's legal counsel.

Reporting Concerns or Violations

You are obligated to report violations of the Code, the law, or any other Company policy or procedure by you or any other personnel. This includes known violations and violations you suspect in good faith may have occurred. However, please note, making false allegations against personnel under the Code – whether to intimidate, harass or otherwise interfere with other personnel or their engagement or role with the Company - is also prohibited. Any such false reporting is itself a violation of the Code.

You must report known or suspected violations as soon as you first learn of the issue. Reports should be a sincere and complete report and otherwise provided in good faith. You may make reports to your supervisor or to any member of the Company senior management team, Human Resources team or our anonymous hotline. You are encouraged to identify yourself when reporting a possible violation to help aid in investigation. (The investigation team will make every effort to protect your identity if you do so.) You are also free to report a violation anonymously via the Company's Incident Response vehicles:
Website: www.lighthouse-services.com/streamlinehealth or 855-222-0755.

Assisting with Investigations

All personnel must fully cooperate with any internal investigations, audits, accounting reviews and similar actions relating to any reported violations (whether you were involved in/or reported the incident or otherwise). This includes responses to any lawsuits, regulatory actions or similar claims or actions that may involve the Company directly or indirectly. Personnel also must not interfere with internal investigations or engage in their own fact-finding or disclosures (subject to the clarifications in the Your Rights section of the Code). All investigations are handled at the direction of the Company's legal counsel, and communication of the investigations should be routed accordingly.

Investigations may include providing additional information and/or allowing searches of Company-provided physical and information technology resources. Personnel should promptly provide all such information and access when requested by the investigation team, and personnel may not at any time attempt to destroy, manipulate, lock or otherwise obscure or restrict such access (subject to any applicable laws).

Commitment to Non-Retaliation and Respect During Investigations

Retaliation against an individual who reports a violation of the Code (or any law or other Company policy) and/or cooperates with any Company investigation of a violation is strictly prohibited and will not be tolerated by the Company. Individuals who engage in such actions have violated the Code and will be subject to disciplinary action accordingly. This includes any type of retaliation, including formal reprimand, changing the scope of a personnel's engagement, suspension, demotion, harassment, humiliation or other intimidating actions, making false claims of violation, reducing pay or compensation and - for associates - downgrading that associate's performance rating or limiting that associate's opportunities for assignments or advancement or excluding that associate from corporate or departmental functions, meetings or other company activities.

Furthermore, the Company expects and requires that personnel and others involved in internal investigations be treated with dignity and respect. Our Legal and Human Resources teams have established processes and procedures to ensure that all internal investigations are conducted by qualified personnel who have been trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly and confidentially.

If you think you are being retaliated against, or that an investigation is being conducted inappropriately, you should report it immediately as you would any other violation of the Code. However, you should feel free to use the other reporting channels defined in the Code if you feel the person or department to whom you originally reported the issue may be involved in the retaliation.

Waivers of Obligations Under the Code

Streamline Health will waive application of the policies set forth in the Code only where circumstances warrant granting a waiver based on the best interests of Streamline Health and its stockholders. Waivers should be understood as granted specifically and on a case-by-case basis. Waivers of the Code for the Company's board of directors and executive officers may be made only by those members of the Board of Directors not involved in the possible waiver. Any waiver pertaining to other personnel must be approved by either the Chief Financial Officer or Chief Executive Officer, who will consult with the Company's Human Resources team, Legal team, Information Security team and similar internal teams as warranted. Records of all waivers must be clearly documented and maintained by the Company's executive officers and must be promptly disclosed as required by law or regulation.

CREATING A SAFE AND PRODUCTIVE WORK ENVIRONMENT

Having a work environment where personnel feel safe and able to work, grow and develop professionally is fundamental to our Company's success. Streamline Health requires all personnel to keep an open, collaborative, respectful and professional work environment at all times. This includes operations at our own facilities, while performing remote activities at a customer or vendor site or at any

location when participating in any business or business activities on behalf of the Company. This section identifies key areas that help us ensure our work environments meet these expectations.

Maintaining a Respectful Work Environment

Respect is a fundamental principle at the Company. Personnel are expected to show respect to others. Having an engaged workforce – one made up of team members who bring a wide variety of skills, abilities, experiences and perspectives – is essential to our business. If people feel excluded or disrespected, they cannot perform at their best. The Company strives to remove any such artificial barriers to the success of the Company and the success of our people. Similarly, we are committed to the principles of equal employment opportunity, equity, diversity, inclusion, and respect.

In addition to the specific provisions regarding harassment, misconduct and similar actions outlined in our Employee Handbook, personnel should make the Streamline Health environment one of open communication and engagement. We do not tolerate discrimination against anyone on the basis of race, color, religion, national origin, sex, age, disability, sexual orientation, gender identity, marital status, past or present military service or any other status protected by the laws or regulations in the locations where we operate. All employment-related decisions must be based on the Company's needs, job requirements and individual qualifications.

We strive to empower all personnel. At all times, please be aware of any conduct that may make another person feel disrespected, uncomfortable or excluded. Similarly, if you feel someone is engaging in that conduct (which often is unintentional), please speak up – whether you are feeling uncomfortable or excluded or feel someone around you is feeling that way. In other words, listen, be inclusive of ideas and experiences and respectfully ask for what you need to do your best work.

Creating this type of environment requires trust, and creating trust requires communication and understanding. We ask all personnel to apply that principle when abiding by this requirement. The Company's senior management and Human Resources teams are always available to help ensure all people feel they are part of a respectful environment.

Workplace Safety and Violence Prevention

To preserve personnel safety and security, weapons, firearms, ammunition, explosives and incendiary devices are forbidden on our Company premises or in our Company vehicles. In addition, our Company will not tolerate acts or threats of violence, including verbal or physical threats, intimidation, harassment and/or coercion.

While violations of the Code should continue to be reported as required above, behavior that also threatens the safety of people or property, or has the potential to become violent, should be immediately reported to your supervisor or the Human Resources team and to law enforcement or building security where appropriate to prevent harm to any individual or property.

Substance Abuse

When performing any business-related functions, Personnel must be free from the influence of any substance, including drugs and alcohol, that might prevent them from conducting work activities safely and effectively. However, the use of illegal substances at any Company facility (or any third party facility while conducting any Company-related business) or at any such events is strictly prohibited. If alcohol is present at an event the Company is hosting or attending in any official capacity, all personnel are expected to abide by all laws relating to consumption and otherwise always conduct themselves in a professional manner. The Company reserves the right to have any personnel tested if there is reasonable suspicion that he or she is under the influence of any such substances.

If you need assistance related to substance abuse we strongly encourage you to seek assistance from qualified professionals – including assistance from any Company employee assistance programs that may be available for associates.

PROTECTING SENSITIVE INFORMATION

One of our most important assets is our proprietary information and intellectual property. Equally as important is the faith our customers, vendors and similar persons and entities place in the Company when we access their proprietary information and intellectual property. As a member of the Streamline Health team, being engaged and informed as it relates to confidentiality, information security and intellectual property protection is a primary expectation in your daily performance. This section is intended to help highlight some key aspects of this requirement.

Handling Proprietary and Confidential Information

You may learn about or have access to confidential and proprietary information when performing your duties. It may be information about the Company, our vendors, customers, personnel or other persons or entities with whom we interact in the course of our business. Personnel who receive or access confidential information have a duty to keep this information confidential and to not disclose it to any person except authorized recipients.

Confidential information includes any information that is not readily available in a general or public manner and has value in remaining confidential. You should view confidentiality in a broad sense. In general, consider information to be confidential if it meets the following criteria:

- Is this information unknown to people outside the Company (and/or the person or entity who disclosed it to us)?
- Would Streamline Health (or the person or entity who disclosed the information to us) be disadvantaged or harmed if others knew this information?
- Would the project be jeopardized if the information was not held in confidence?
- Could someone use the information in a way that would hurt Streamline Health or our competitive advantage or reputation (or that of the person or entity who disclosed the information to us)?

- If you had the same type of information and it was yours, would you expect it to be kept confidential?

Some common examples: business strategies, marketing/sales/service strategies and plans, unpublished financial information, potential merger/acquisition activity information, product architecture, software code, engineering and manufacturing ideas, product and network designs, customer lists, pricing strategies, personnel data, personally identifiable information pertaining to our associates, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers).

All personnel who interact with confidential information in any capacity must:

- Access and use this information only for authorized purposes.
- Share this information only with authorized recipients who have a need to know for proper business reasons, especially if confidential information is going outside of the Company.
- Avoid copying this information except as necessary to accomplish the necessary purposes.
- Limit use of confidential information of third parties to those authorized in the Company's agreement with that party or as authorized by law.
- Ensure we have the necessary permissions (including an approved and valid non-disclosure agreement) if you plan to send any of this information to a person or entity outside of the Company.
- Never post any of this information publicly, including social media sites, public forums or other locations, whether posted anonymously or not.
- Consider your surroundings when displaying this information in a potentially public place, like talking on a cell phone or working on a laptop.
- Follow all secure transmission and storage methods when required by the Company's information security policies and protocols.
- Ensure copies of this information in any form (such as memos, notebooks, flash drives, smart phones, computer disks and laptop computers) are clearly marked as such and stored securely.
- Ensure copies of this information are properly tracked and logged so we can meet any destruction and retention obligations that apply to the information.
- Store, access and display confidential information only on Company equipment and Company systems following the Company's information security policies and protocols.

Please note, you may be subject to a non-disclosure agreement or similar agreement or arrangement in place with Streamline Health. You should always review and abide by those terms. If the terms above are different than those in your agreement, you should follow the requirement(s) which would best protect the confidentiality of the information at issue.

Handling Protected Health Information and Other Identifiable Information

As a provider in the healthcare technology sector, the Company handles protected health information and similar data. While all confidential information is important, we must take extra care when handling this type of information. Personnel must meet abide by applicable laws, rules and regulations as well as our agreements with our customers. And, even where not required by law, personnel should be cautious when handling or accessing this type of information to ensure it is not used for improper purposes or shared with any third party unless authorized in writing (or we are legally required to do so under a court-ordered subpoena or similar legal order or obligation).

Disclosure of Material Company Information (“Insider Information”)

As part of a publicly traded organization, the Company must take care to ensure information about the Company and its operations is disclosed in an appropriate and fair manner. This allows our investors and potential investors to fairly evaluate their investment in the Company. Personnel must take extra care to ensure that confidential and proprietary information of the Company and its operations, such as contracting activity, corporate activity, financial condition and strategic product and business plans. Personnel should not release any such information unless and until that information is released to the public through approved Company channels (usually through a press release, an SEC filing or a formal communication from a member of senior management). Personnel also may not use confidential information for personal benefit. Please review the Company’s Insider Trading Policy for additional information on this topic.

Information Retention and Destruction

Records containing proprietary information must be maintained, retained and destroyed in accordance with our policy as it applies to the specific type of proprietary information involved. Similarly, proprietary information (especially that of our customers and their patients) must be destroyed in accordance with the data destruction guidelines in our policy and any applicable legal or regulatory obligations.

Protecting Company Intellectual Property

Our intellectual property (IP) is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights.

As a general rule, the things you create for Streamline Health belong to our Company if it is created or developed, in whole or in part, on Company time, as part of your duties or through the use of Company resources or information. This “work product” includes inventions, discoveries, ideas, improvements, software programs, artwork, and works of authorship. For all personnel, this arises from the agreements (if any) you have with the Company, noting specific terms may be specified in such agreements which would apply to the associated personnel for the applicable project. For associates, this also arises from your obligations as an employee of the Company.

Personnel are required to abide by the following requirements when creating, handling and distributing any work product owned by the Company:

- The work product is our Company's property (it does not belong to individuals).
- The work product should be considered confidential information of the Company.
- Personnel must promptly disclose to Streamline Health, in writing, any such work product and provide full and complete documentation about work product produced.
- Personnel must cooperate with our efforts to obtain IP protection for our Company IP, which may include patents, registered copyrights and registered trademarks.
- Personnel are not authorized to create works not consisting of work product on Company time or using any Company resources or materials.
- Personnel may not incorporate materials owed by any third party – including open-source code, art work and other such materials that may be generally available as well as materials owned by third party personnel – unless an appropriate license agreement has been put in place (with review and confirmation by the Legal team).
- For consultants and similar third-party personnel, a written agreement specifying ownership terms must be agreed upon and signed before any services that may result in any work product may begin.
- Work product may not be shared with third parties without appropriate authorization by your supervisor and only if an appropriate license or non-disclosure agreement approved by the Legal team has been put in place first.

Personnel also must follow any associated marking requirements that apply to IP (whether created by you or otherwise). This can include trademark and service mark designations, copyright notices or patent markings as well as identification requirements from a third party. However, these designations should not be used or affixed without authorization of the Marketing team, especially as it relates to registered trademark (®) and patent designations.

Respecting Third Party Intellectual Property Rights/Infringement

In addition to protecting the Company's intellectual property, we also must respect the intellectual property belonging to third parties. Personnel may not take any actions that infringe on the IP rights of others or imply such infringement has happened.

If we intend to use intellectual property of any third party, a formal, written license must be obtained to use intellectual property (assuming we have not signed a full purchase agreement for that intellectual property). This includes direct incorporation or distribution of such property as well as referencing, reverse engineering or otherwise using the heart of another person's intellectual property to create or modify our own. License documentation must be reviewed and approved by the Legal team. Personnel are then responsible for ensuring their use of third-party intellectual property abides by the terms of the applicable agreement(s), including any use limits, notice/marketing requirements and distribution or copying limits.

Examples of inappropriate activities relating to third party IP can include the following:

- Disclosing non-public intellectual property inappropriately or without approval from the Legal department.
- Using company resources or time to create or invent something unrelated to our business.
- Using any third party's intellectual property (including from a previous employer or vendor) without that company's permission in a formal written agreement.
- Making, distributing or using unauthorized copies of software or licensed information, except as specified in the licensing agreement.
- Incorporating copies of third-party content – including code, images, cartoons, videos, magazine/journal articles, logos or other publications or content – into any documents or materials you create unless you have the authority or license to do so.
- Using intellectual property provided for one purpose for other development purposes, especially intellectual property of a competitor.
- Hiring a competitor's employee to obtain that competitor's trade secrets.
- Using or distributing the name or trademark of another company within any materials without authorization.

Personal Information Privacy of our Personnel

Streamline Health respects the privacy of our associates and other personnel where we may need personally identifiable information or similar such data. Our Company will collect and handle your personal information only for business reasons consistent with applicable law. Access to this personal information is limited only to those who have a legal right to see the information, and then only on a need-to-know basis for the performance of their job. Those who handle such personal information are advised on a regular basis of their duty to protect this information. Personnel who engage with the Human Resources team or otherwise handle personal information of other personnel are to abide by these provisions and all related Company policies and protocols relating to use of sensitive personnel information.

All associates have the right to review and comment on information contained in their personnel records maintained by the Company. The Company will also cooperate with associate's other actions relating to such records as allowed and required by applicable law.

USING COMPANY RESOURCES / INFORMATION SECURITY

Streamline Health relies upon an array of information systems and technology resources intended to maximize our efficiency in carrying out your role. It is essential that these resources are properly used and protected to ensure that these resources are accessible for business purposes and operated in a cost-effective manner, that our Company's reputation is protected, and that we minimize the potential for unauthorized use or risk. This section helps identify key responsibilities all personnel have for Company assets and for maintaining information security when using Company assets.

Authorized Use of Company Resources

The Company's property, such as computer equipment, computer software programs (whether owned or licensed by the Company) buildings and products, as well as our networks and communication resources, such as computer storage, telephone and facsimile lines and conference bridges and e-mail and similar accounts, are expected to be used only for legitimate business purposes. These resources are Company property, and you are responsible for using the highest standards of behavior when using these resources.

Any use of Company resources which is illegal or otherwise in violation of the Code (or any other applicable Company policies) is strictly prohibited. Furthermore, using Company assets and resources for personal financial gain is strictly prohibited.

Subject to applicable laws, your use of these resources (and any personal resources involved in performing Company business) may be subject to inspection, retention and review by our Company and our outside counsel if it relates to compliance with the Code and any other Company policies or applicable laws, rules, regulations or other legal authority or order. This may be with or without the associate's or personnel's (or other third party's) prior knowledge, consent or approval. Personnel are expected to cooperate with any such efforts if the need arises.

Information Security

Keeping the proprietary information of the Company and our customers, channel partners and licensors secure and using it in an appropriately safe manner are top priorities for our Company. Personnel must at all times comply with Streamline Health's information security policies regarding the security, use, possession, storage and handling of such proprietary information. This includes (without limitation) policies on security incident response and reporting, data retention and destruction and handling protected health information (and otherwise complying with the requirements of HIPAA and its related laws and regulations). Please remember these are in addition to your confidentiality obligations and similar obligations relating to using and handling sensitive information.

Responsible Use of Company Resources

In addition to secure usage, all personnel are also expected to protect our assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our operations and business capabilities. You should keep assets (and any access credentials) in a secure location at all times. Please treat Company assets with the same care you would if they were your own. We must each assist the Company in these efforts and efforts to control costs where possible.

COMPLIANCE WITH LAWS AND REGULATIONS

It is important that we are all aware of the laws and regulations applicable to the Company's business and our conduct. Violating our legal and regulatory obligations, or allowing or encouraging others to do so, exposes both Streamline Health and our personnel to risk. These violations may also result in legal proceedings and penalties including, in some circumstances, civil and criminal penalties that could affect you personally in addition to the risks posed to Streamline Health and our personnel. This section is intended to outline each person's responsibility for helping ensure compliance, and it highlights some key areas of the law that are applicable to the Company.

Personal Compliance Obligations

As a member of the Streamline Health team, we are each responsible for understanding and abiding by all obligations and requirements that may apply to us under any applicable laws, rules and regulations. You should also be alert to changes in the law or new requirements that may affect your role or your business unit. The Company strives to provide training on these obligations but, this is ultimately a personal responsibility for each of us.

Please note that provisions of the Code may address specific laws and/or regulations. However, that does not imply compliance with those laws or regulations are more or less important than compliance with any other applicable law or regulation (or other legal obligation).

If you have questions concerning any compliance-related activities, please contact the Company's Human Resources team before taking (or not taking) the action in question.

Legal and Regulatory Investigations and Communication

Personnel are expected to fully cooperate with any legal or regulatory investigations and inquiries. However, unless the law or regulation itself requires otherwise, personnel should not engage directly with regulators or other government agencies or officials on behalf of the Company unless directed otherwise by the Human Resources team or the Company's Chief Financial Officer. Having an accurate, complete, and unified response is key to appropriate investigation and response. All communications of any nature with any such officials should be coordinated through the Human Resources team (subject to the Your Rights section of the Code).

Statement on Insider Trading and Information Disclosure Laws

Personnel may come into possession of material nonpublic information ("inside information") about the Company or another publicly traded organization in connection with performing their duties. Personnel must abide by the Company's Insider Trading Guidelines Policy when considering making any trades in the Company's securities and/or disclosing inside information to any person or entity. Personnel (especially executives and directors) are also expected to report and clear any proposed transactions that would require any reporting activity by the Company. This section applies to all personnel and any other related persons who would be subject to the trading and disclosure restrictions in any applicable laws, rules or regulations or in the Company's Insider Trading Guidelines Policy.

Statement on HIPAA and Privacy Laws

The Company handles sensitive information about our personnel and the patients of our customers in providing our products and services. This information may include “protected health information” as defined in the Health Insurance Portability and Accountability Act of 1996, Public Law 104-191, as amended (HIPAA), and its related laws and implementing regulations and rules. It may also include other personally identifiable information which is subject to federal and state privacy laws. Personnel must handle such information in accordance with all such laws, and personnel may not use or disclose such information in any way which would cause the Company (or any of our customers as covered entities under HIPAA) to violate any such laws. The Company has established additional policies and protocols relating to this type of sensitive information, and personnel must at all times abide by those obligations.

Statement on Antitrust and Fair Competition Laws

Streamline Health requires that all directors, officers, and personnel comply with antitrust and competition laws. International, US federal and state antitrust and competition laws prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace. Personnel must be particularly careful when interacting with any employees or representatives of Streamline Health’s competitors. Under no circumstances should you discuss our pricing models, product strategies or other strategic business terms or any material details regarding our customers or with any employees or representatives of our competitors or indirectly through any customers where we may be working with our competitors directly. Engagement with competitors in any channel partner, joint development or similar capacity must be approved by senior management. You should also use extreme care to avoid any improper discussions with our competitors, especially at trade association meetings or other industry or trade events where competitors may interact. Remember that “agreements” and “arrangements” between competitors do not need to be written in order to violate applicable antitrust and competition laws. Informal, verbal, or implicit understandings, i.e., knowing winks, are also violations. Antitrust violations in the U.S. may be prosecuted criminally as felonies and can result in severe penalties for Streamline Health and any personnel or other person who participates in a violation.

Statement on Anti-Money Laundering and Other Fraudulent Transaction Laws

The US (and many countries around the world) have strict laws and regulations aimed at preventing people from deceiving another person for their own personal gain. These include laws relating to payment and securities fraud, embezzlement and misappropriation of company or personal funds, insurance fraud, tax evasion and identity theft. Personnel must avoid any actions that result in or constitute (directly or indirectly) the theft, fraud, embezzlement or similar such illegal misuse of any Company funds, physical assets, intellectual property assets, bank accounts or similar financial accounts, credit cards or credit card accounts, equity lines or other Company property or assets – or those of any customer, vendor or other such third party.

More specifically, personnel must avoid engaging in or initiating any transactions that violate any anti-money laundering laws in the US or any other applicable country or jurisdiction. Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose Streamline Health and individuals to severe

sanctions. Our Company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions.

Anti-fraud and anti-money laundering laws of the United States and other countries and international organizations require authorized, transparent payments for legitimate, legal purposes, and business transactions must be between identified, legal parties. We are committed to full compliance with these laws and expect the same of our personnel. Similarly, the Company will conduct business only with reputable customers and providers involved in legitimate business activities and transactions.

Statement on Anti-Corruption / Anti-Bribery / Anti-Kickback Laws

The United States and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. No Streamline Health personnel, officer, agent, or independent contractor acting on our behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value to influence or induce action, or to secure an improper advantage. "Anything of value" should be understood broadly and includes things like cash, gifts, meals, entertainment, travel and lodging, personal services, charitable or political donations, business opportunities, favors, offers of employment or engagement and any other gifts or offerings restricted by applicable law or regulation. This also can include "commercial bribery", where something of value is given to a current or prospective business partner with the intent to obtain business or influence a business decision, as well as "kickbacks", where there is an agreement or arrangement to return a sum of money to another party in exchange for making or arranging a business transaction, especially in the healthcare space.

Some specific laws you should be aware of come into play in this regard:

- **The US Foreign Corrupt Practices Act (FCPA)**: The FCPA prohibits payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of using that official's influence in any improper or unauthorized manner to obtaining, retaining or directing of business. We expect all personnel acting on behalf of Streamline Health to strictly abide by these laws. If you are requested to make any facilitation payment, licensing payment or similar such payment that could be to any of the foreign representatives above, you must immediately notify the Legal team to ensure the payment would be authorized and proper. Note that the definition of a "foreign official" is broad and includes any person acting in an official capacity for any of the following:
 - Any foreign government including any department, agency, military branch, court or legislature
 - Any partially or wholly owned government entity, such as a nationalized corporation or industry, including government-owned hospitals and other healthcare providers
 - Any political party, including party officials or candidates
 - Employees of public international organizations (or any of their departments or agencies) such as The World Bank, the International Finance Corporation or the Red Cross
 - Any member of a royal family
- **Federal and State Healthcare Anti-Kickback Laws**: The US Federal Anti-Kickback Statute, at a high level, prohibits the exchange (or offer to exchange), of anything of value, in an effort to induce (or reward) the referral of federal health care program business. While this may seem to apply only to providers directly involved in providing medical care itself, the statute has been interpreted broadly, and it can encompass "behind the scenes" products and services that may be paid for through federal healthcare funds – including software and similar services.

Personnel need to be aware of these restrictions if such payments may be involved, and Personnel may not offer anything of value to a customer or prospective customer if such funds are involved in payment. Personnel who may be involved with the Company's sales and billing functions are also expected to proactively engage with our customers regarding their own anti-kickback policies to help ensure both the Company and our customers are meeting the expectations under these laws.

You must avoid participating in these types of exchanges or arrangements - or even the appearance of such exchanges or arrangements – in all our business dealings. Such exchanges or arrangements are strictly prohibited by our Company policy, even if they may technically be “legal” in the applicable jurisdiction. You should contact your manager and/or the Legal team prior to offering anything of value if you have any questions about whether a given gift or action would be proper for these purposes.

Statement on Trade Laws (Export/Import Control)

The Company is subject to United States federal import and export laws and regulations, and we require our personnel to comply with the same. These laws restrict transfers, exports, and sales of products, software or technical data from the United States in authorized encrypted formats and/or without proper designations when required. They also restrict the re-export of certain such items from one non-U.S. location to another.

Personnel are also prohibited from engaging in any Company business with any person or entity (including personnel) with any U.S. embargoed country or anyone on the U.S. Treasury Department's list of Specially Designated Nationals or the U.S. Department of Commerce's Table of Denial Orders. These requirements also include any similar laws and regulations (and associated designation lists) that may exist in countries where Streamline Health (or any of our vendors, if applicable) elects to do business. Should any personnel (or the employer of any non-associate personnel) be named on any such lists, such designations must be immediately reported to the Company's Legal team, and such person should promptly comply with all instructions on the scope and continuation of their performance with the Company and information and documentation requests that may come from the Company's Legal team or senior management.

If you are involved in importing and exporting goods and data, you are responsible for knowing and following these laws. All contracts to provide software, goods or services outside the United States requires approval from the Legal team as well as either the Chief Financial Officer or Chief Executive Officer.

Similarly, if you are traveling overseas and plan to conduct business while outside the US or to take any Company equipment outside of the US, you must ensure no sensitive information is stored on such equipment (or can be accessed outside of the US) prior to departure, and you must comply with all Company policies on non-US remote work activities and export and entry laws and regulations such that neither you, nor any Company equipment or information, would be improperly detained or destroyed as a result of your election to travel overseas.

Statement on Government Customers/Contracting

When doing business with federal, state, or local governments, we must ensure all statements and representation to government procurement officials are accurate and truthful, including costs and other financial data. Misstatements to government entities can have severe consequences to both the Company and our personnel. If your assignment directly involves the government or if you are responsible for someone working with the government on behalf of Streamline Health, be alert to the

special rules and regulations applicable to our government customers. Additional steps should be taken to understand and comply with these requirements. Any conduct that could appear improper should be avoided when dealing with government officials and employees. Payments, gifts, or other favors given to a government official or employee are strictly prohibited as it may appear to be a means of influence or a bribe. Failure to avoid these activities may expose the government agency, the government employee, our Company, and you to substantial fines and penalties. For these reasons, any sale of our products or services to any federal, state, or local government entity must be in accordance with our Company policy.

AUTHORIZED REPRESENTATION OF THE COMPANY

We pride ourselves on having an empowered, informed team at Streamline Health. However, personnel need to be aware of how their public statements and actions may reflect on the Company. Personnel also need to understand what authority has (and has not) been formally granted to them by the Company and ensure their conduct aligns with that scope of authority in both action and perception. This section can help you ensure your activities best support the Company without exceeding the authority and role you have with Streamline Health.

Honest Advertising and Marketing

It is our responsibility to accurately represent Streamline Health and our products and services in our public-facing materials, including our marketing, advertising and sales materials as well as public filings and similar documents. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values, may violate laws and is not authorized by the Code.

Sometimes it is necessary to make comparisons between our products and our competitors. When we do we will make factual and accurate statements that can be easily verified or reasonably relied upon. Similarly, when making designations about any recognitions or awards our products and services may achieve, we will note those accolades in a factual, supportable way.

Personnel should be cognizant of these requirements anytime they are making statements outside the Company that could be viewed as marketing, advertising or other such statements. Any questions on these types of statements should be cleared through the Company's Marketing team to ensure they align with these standards as well as the Company's other branding and messaging goals.

Representative Authority

Personnel are not authorized to act in an official capacity for Streamline Health unless that authority has been specifically granted to you by the Company through our policies or by senior management. This includes entering into any agreements or other formal arrangements (including click-through agreements or terms), assuming responsibility or liability for the Company or making other formal, binding statements on behalf of the Company. You also may not, however, use our corporate name, any brand name or trademark, logo owned or associated with Streamline Health or any letterhead stationery for any personal purpose or any unauthorized business purpose. Personnel with leadership roles in the Company should take extra care to clarify what responsibility and authority they have (and do not have) with the Company since their title may imply authority, even if it is not granted. Similarly, third party personnel have no authority to act on behalf of the Company in any way unless expressly and specifically authorized in the applicable agreement with Streamline Health and, then, only if

specifically authorized by the corresponding representative of Streamline Health directing the engagement.

Communicating with Media, Investors and Other External Parties

Personnel are not authorized to speak with the media, investors or analysts on behalf of our Company unless specifically authorized by our Chief Marketing Officer. To ensure professional handling, all media requests and requests from financial analysts, stockholders, and industry analysts must be directed to our Marketing department.

Personnel also must be careful in making personal statements to any outside parties or on any public or partially public forum. Unless authorized, do not give the impression that you are speaking on behalf of Streamline Health in any communication that may become public. This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services.

Personnel may not use any Streamline Health names or logos or your title or contact information with the Company for personal purposes unless you have specific permission from the Marketing team and then only for authorized purposes relating to your role at the Company. Also, personnel may not endorse, review or comment (positively or negatively) on any other company's or person's products or services in a way that states or implies such opinions may be of the Company. This includes posts to online forums, social media sites, review forums, blogs, chat rooms, and bulletin boards as well as endorsements or similar quotes or statements given to a third party for such use. Personnel should be aware of any implied authority that may accompany statements made, even if unintended. This is especially true for social media sites and similar sites where your profile may accompany your statements and suggest you are making statements in an official capacity on behalf of Streamline Health.

The use of electronic communication methods, social media and similar technologies is ever-growing, and they are an important part of running a successful business. Personnel are always responsible for content in e-mail messages, social media posts, blog posts or other electronic communication. This includes posts and messages made anonymously or under a pseudonym. Keep in mind that electronic transmissions should always be understood as permanent and easily transferable, even if you think you deleted them or used a communication method that is intended to be temporary. They also can be viewed as "public" disclosures, even if shared through an unidentified account or through private messages or where privacy restrictions have been enabled. These statements can affect our Company's reputation and relationships with coworkers and customers now and in the future. Please think about these factors when using these technologies in the course of your engagement with the Company.

Remember all communications relating to the Company's business are presumed confidential and should not be shared or otherwise disseminated outside of Streamline Health, except where required for legitimate business purposes. However, please note all of the provisions in this section remain subject to the Your Rights section of the Code.

Use of Company Financial Accounts and Funds

Streamline Health personnel are not authorized to use the Company's financial accounts or funds unless expressly authorized by the Company's Chief Financial Officer.

Even if authorized, the following activities are always restricted:

- Making, or asking others to make, a false or misleading entry or report in any financial record or ledger (whether or not the report is financial or non-financial or is for internal or external use).
- Using or transferring Streamline Health funds for any purpose that would be in violation of any law, regulation, or Company policy.
- Requesting or receiving reimbursement for out-of-pocket expenses for any expenses which are either not approved, unrelated to the Company's business, outside the Company's reimbursement policies, fraudulent or overstated, illegal or otherwise in violation of the Code.

MAINTAINING COMPANY RECORDS

As part of a publicly traded organization, accurate and reliable records are crucial to our business. We are committed to maintaining accurate Company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. We are responsible for helping ensure that the information we record, process, and analyze is accurate, and recorded in accordance with applicable legal or accounting principles. We also need to ensure that it is made secure and readily available to those with a need to know the information on a timely basis. Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business. This section addresses key aspects of record creation and retention for the Company to help you consider how this impacts your duties with the Company.

Accurate Financial Records / Internal Accounting Controls

All Company records must be complete, accurate, and reliable in all material respects. Investors count on us to use and provide accurate information so they can make good decisions. Reporting accurate, complete and understandable information about our business, earnings, and financial condition is an essential responsibility of all personnel. Be sure that any document you prepare or sign is correct and truthful. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments, or receipts are inconsistent with our business practices and are prohibited. The following are examples of activities not allowed:

- Maintaining undisclosed or unrecorded funds or assets for any purpose.
- Reporting or recording any inaccurate business transactions and/or payments or omitting such transactions and/or payments that must be recorded under Company policies.
- Making, or asking others to make, false, misleading, or artificial entries on an expense report, time sheet or any other report.
- Giving false quality or safety results.
- Recording false sales or recording sales outside of the time period they actually occurred.
- Understating or overstating known liabilities and assets.

- Delaying the entry of items that should be current expenses.
- Hiding the true nature of any transaction.
- Providing inaccurate or misleading information for Company benefit programs.

Participation in Audits

It is part of your responsibility (especially for all associates, directors, and officers of the Company) to make open and full disclosure to, and cooperate fully with, the Company's outside accountants in connection with any formal audit or review of our Company's financial statements.

Intentional or Negligent Financial Record Keeping

*If you feel any of the following has occurred, **please report the issue immediately to either the Company's Chief Financial Officer or Controller:***

- Our Company's books and records are being maintained in a materially inaccurate or incomplete manner.
- You feel that you are being pressured to prepare, alter, conceal or destroy financial documents or records in violation of our Company policies.
- You have any reason to believe that someone has made a misleading, incomplete, or false statement to an accountant, auditor, attorney or government official in connection with any investigation, audit, examination or filing with any government agency or regulatory body.

Managing Records Properly

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. Records consist of all forms of the applicable information created or received by Streamline Health, whether originals or copies, regardless of media. Examples of Company records include paper documents, e-mail, electronic files stored on disk, tape or any other medium physical or virtual that contains information about our Company or our business activities. These records are the property of Streamline Health and should be created, marked, maintained, and retained in accordance with our policy.

Most of us participate to some extent in recording, processing, or analyzing financial or other information, or in the review and audit of these activities. These processes exist to assist in business decision-making and the evaluation of Streamline Health's performance by our Board and senior management. They are also necessary to ensure compliance with legal and other requirements pertaining to the retention of information and its disclosure to others, including to investors and regulators.

CORPORATE RESPONSIBILITY

Consistent with our Company values, we pride ourselves on being a company that operates with integrity, makes good choices, and does the right thing in every aspect of our business. We will continually challenge ourselves to define what being a responsible company means to us, and we should all work to translate our definition into behavior and improvements at Streamline Health. We seek to align our corporate activity, social and environmental efforts with our business goals and track our progress (both qualitatively and quantitatively) on those efforts. This section better defines key aspects of these goals so you can better align your activities as well.

Avoiding Conflicts of Interest

Personnel must avoid any conflict, or even the appearance of a conflict, between your personal interests and the interests of our Company. We have an obligation to make sound business decisions in the best interests of Streamline Health without the influence of personal interests or gain. Conflicts of interest expose our personal judgment and that of our Company to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us. Should any business or personal conflict of interest arise, or even appear to arise, you should disclose it immediately to senior management or the Chief Financial Officer for review. Please note, if a potential conflict is waived by the Company, that is on a one-off basis. Additional conflicts and/or expansions of the potential conflicts must still be reported.

A conflict exists when your interests, duties, obligations or activities, or those of a family member are, or may be, in conflict or incompatible with the interests of Streamline Health. This can be via any investment, interest, association, or activity that may cause others to doubt there or our Company's fairness or integrity, or that may interfere with their ability to perform job duties objectively and effectively. Some specific activities that could represent conflicts of interest include:

- Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business, or competes with our Company.
- Hiring a supplier, distributor, or other agent managed or owned by a relative or close friend.
- Soliciting or accepting any cash, gifts, entertainment, or benefits that are more than modest in value from any competitor, supplier, or customer.
- Taking personal advantage of opportunities or favors offered to you by virtue of your employment or engagement with Streamline Health.
- Arranging for discounts on personal purchases of a supplier or customer's products or services should not be accepted unless such discounts are offered to all personnel in general.
- Using Company property, information, and position for personal reasons or otherwise using (directly or by your family members) your position or any Company property or information for personal gain.

Political Activities and Contributions

You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. You may not make or commit to political contributions on behalf of Streamline Health unless approved by the Company's Chief Financial Officer.

Charitable Contributions

We support community engagement and development throughout the world. Streamline Health often chooses to contribute to organizations accordingly. We also encourage our personnel to contribute to these efforts. However, as with political activities, you may not use Company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by our Company. Outside of engaging with Company-organized community service projects, you also may not make or commit to contributions on behalf of Streamline Health (in time or money) unless approved by the Company's senior management team.

Obtaining Competitive Information Fairly

Gathering information about our competitors (often called "competitive intelligence") is a legitimate business practice. Doing so helps us stay competitive in the marketplace. However, we must never use any illegal or unethical means to obtain information about other companies. Legitimate sources of competitive information include publicly available information like news accounts, industry surveys and reports, competitors' websites, competitors' displays at conferences and trade shows and information publicly available on the Internet. You may also gain competitive information appropriately from our customers and suppliers, provided they are not themselves prohibited from sharing the information and/or providing us the right to use the information for these purposes.

When working with consultants, vendors, and other partners, personnel must ensure that they understand and follow this Streamline Health policy on gathering competitive information. Other personnel must also make sure any information they provide meets these requirements or otherwise such information should not be shared with the Company or any of our personnel.

Human Rights

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. Our Company will only engage suppliers and direct contractors who demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws. Streamline Health does not use or condone the use of slave labor or human trafficking, denounces any degrading treatment of individuals or unsafe working condition, and supports our products being free of conflict minerals.

Environmental Stewardship

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our personnel, customers, communities, shareholders, and the environment. We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact. All personnel are responsible for identifying ways to help Streamline Health conduct business in a way that is protective of the environment. Personnel whose work directly affects or involves environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work and otherwise ensure Streamline Health maintains compliance with both the requirements and spirit of all applicable environmental laws and regulations.

Gifts and Entertainment

Modest gifts, favors, and entertainment are often used to strengthen business relationships. However, no gift, favor or entertainment should be accepted or given if it obligates, or appears to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment. Personnel should always confirm with their supervisor before giving any gifts where it is outside the normal course of our business operations or otherwise may appear inappropriate (even if the gift would not violate any laws or is based on an event where a gift may be seen as appropriate).

Commitment to Fair Purchasing

We believe in doing business with third parties that embrace and demonstrate high principles of ethical business behavior. We rely on suppliers, contractors, and consultants to help us accomplish our goals and to abide by the Code. In return, personnel should treat third party personnel according to the spirit of our values. To create an environment where our suppliers, contractors, and consultants have an incentive to work with Streamline Health, the Company strives to always offer fair opportunities for prospective third parties to compete for our business. Similarly, we strive to always have the manner in which we select our suppliers and the character of the suppliers we select reflect the way we conduct business internally.