



CODE OF CONDUCT AND ETHICS

Rigorous compliance. Ethical behavior.

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MESSAGE FROM

PAN Foundation leadership

For 20 years, the PAN Foundation has provided life-changing financial assistance to more than one million patients living with serious and chronic illnesses to help them pay for their out-of-pocket treatment costs and advocate for healthcare access and affordability. Even as we approach two decades of service, our core mission remains the same: to ensure that no patient forgoes critical medical treatment due to cost.

As an independent, public charity with a life-saving mission, the PAN Foundation is committed to meeting the highest standards of conduct. We are proud to be part of the PAN Foundation and represent its commitment to integrity, dignity, excellence, and intention in all that we do. These core values enable us to carry out our mission on behalf of the thousands of patients who depend on us each year, while safeguarding the tremendous trust that has been placed in our hands.

As we continue to define the standards of excellence for independent charitable patient assistance foundations, it is imperative that we deliver our mission in compliance with all applicable laws, regulations, policies, and procedures. To ensure that we fulfill this commitment while operating in a complex and highly regulated environment, we have established a rigorous and effective Compliance Program, with independent monitoring and oversight. The Code of Conduct and Ethics (hereon 'the Code') is foundational to the Compliance Program.

The Code is our tool for guiding decisions and setting standards for our conduct. PAN's Board of Directors and leadership are deeply committed to governing and managing the PAN Foundation in a manner that advances our mission and upholds our values, while fully adhering to this Code.

Our success requires active participation and adherence to the Code from every individual associated with our organization. If you see or know of practices, unethical behavior, or violations pertaining to the Code, a PAN Foundation policy or procedure, or any applicable law or regulation, you are responsible to speak up and report your concerns.

I encourage you to read the Code carefully and integrate the PAN Foundation's values into everyday practice. Your commitment to uphold the Code is vital to our ability to serve patients in need.



Kevin L. Hagan
President and CEO



Mia Harmon, JD
Chief Compliance & Privacy Officer

Our guiding inspiration

The needs of our patients guide everything we do:



Our mission:

Advance equitable health outcomes by providing financial assistance and advocating for healthcare access and affordability



Our vision:

A nation where no patient goes without treatment due to cost



Our values:

The principles that guide our organization and our conduct

Who we are

The PAN Foundation is an independent, national 501(c)(3) organization dedicated to helping federally and commercially insured people living with life-threatening, chronic, and rare diseases with the out-of-pocket costs for their prescribed medications.

Since 2004, we have provided more than one million underinsured patients with \$4 billion in financial assistance. Partnering with generous donors, healthcare providers and pharmacies, we provide the underinsured population access to the healthcare treatments they need to best manage their conditions and focus on improving their quality of life and advocating for healthcare access and affordability.

Our values

Integrity

Excellence

Dignity

Intention

Purpose of the Code

The Code helps us put our values into practice and ensures that PAN practices the highest standards of ethical behavior and upholds its compliance commitment in today's complex healthcare environment. The Code is designed to provide general guidance and supplement PAN's detailed policies and procedures. The Code does not replace the need to review and understand relevant policies and procedures.

It is important that you understand the Code and know how it applies to you. If you do not find the information you're looking for in the Code, contact the Compliance Office.

The Code is applicable to all individuals either acting as or representing PAN in any capacity.

Commitment from the Board of Directors and leadership

The PAN Foundation's Board of Directors and leadership pledge their commitment to upholding the Code of Conduct and Ethics and to implementing a rigorous and effective Compliance Program. The Board of Directors and leadership team also commit to governing and managing PAN in a manner that advances our mission, while fully adhering to this Code.

The PAN Foundation's Board of Directors is responsible for approving the Code. Given PAN's commitment to the highest standards of conduct, the Compliance Office reviews the Code on an annual basis and presents proposed updates for the Board's review and consideration as needed.

Who must follow the Code

The Code must be followed by all individuals who are acting as or representing the PAN Foundation in any capacity.

This includes Board members, employees, contractors, and consultants. The Code must also be followed by volunteers and other people whose conduct may be directed by the PAN Foundation, regardless of whether and by whom they are paid.

All individuals acting as or representing PAN in any capacity receive regular training on the Code and relevant laws, policies, and procedures.



Duty to report

All individuals acting as or representing PAN—including you—have an affirmative duty to report any concerns or issues relating to potential non-compliance with applicable laws, regulations, policies, or procedures.

The PAN Foundation does not tolerate retaliation of any kind and adheres to a non-retaliation policy to protect individuals who report concerns or compliance issues. If you report a potential violation of law, regulation, policy, or procedure in good faith—which means that you believe or perceive the reported information to be true and accurate—you will not face disciplinary action or retaliation.

How to report concerns

You are expected to follow all laws, regulations, government guidelines, policies, and procedures. Anyone who is aware of a potential or actual violation should report this information. In addition, if you have a question or concern about potentially wrongful, unethical, or illegal activity, the following options are available:

- Discuss the issue or concern with a supervisor. A direct supervisor is most familiar with your responsibilities and applicable laws, regulations, policies, and procedures.
- If you are not comfortable contacting a direct supervisor or do not receive an adequate response, contact a member of senior management, including the President and CEO or the Chief Compliance and Privacy Officer.
- You may also confidentially and anonymously contact the compliance hotline.

Using the compliance hotline

The compliance hotline is a confidential and anonymous way to report concerns. There are five ways to report concerns through the compliance hotline.

- **Phone:** Call 877-210-0006 to speak with a live operator. The hotline is available 24 hours a day. You can choose to remain anonymous while reporting the nature of your concern.
- **Third-party website:** Use the [Lighthouse Services website](#) to submit a concern.
- **Email:** Email a concern to reports@lighthouse-services.com. Please include the PAN Foundation as the company name with your report.
- **Smartphone application:** Download The Anonymous Reporting app, available in the [Apple Store](#) and [Google Play Store](#), to report a concern. On the app, use the keyword **panfoundation** to save and submit your report. If you need help navigating the app, reference [these instructions](#) to submit or follow up on a report.
- **Fax:** Fax your report to 215-689-3885 (please include the PAN Foundation as the company name with your report).

No retaliation

You need to feel comfortable and confident when sharing your concerns without fear of possible retaliation. The PAN Foundation does not tolerate retaliation of any kind and adheres to a non-retaliation policy to protect individuals who report concerns or compliance issues. You will not face disciplinary action or retaliation when reporting a perceived issue, problem, concern, or violation to management, the Chief Compliance and Privacy Officer, or the compliance hotline in good faith.

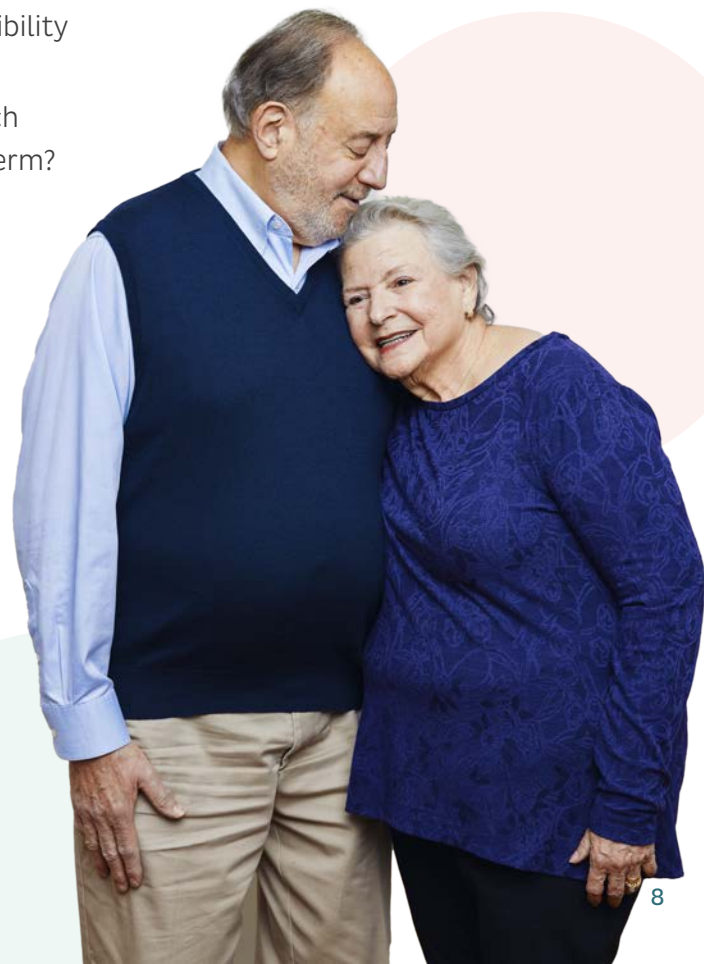
When violations happen

Reports received by the Compliance Office will be reviewed and responded to appropriately and in a timely fashion. All allegations of wrongdoing will be carefully investigated before any action is taken. The rights of all individuals, including any who are subject to a compliance hotline report, will be respected and protected.

Do the right thing

Several key questions can help guide your behavior and identify situations that may be unethical, inappropriate, or illegal. Ask yourself:

- Does what I am doing comply with PAN's guiding principles, Code of Conduct and Ethics, and organizational policies?
- Will this decision or action build trust in and credibility for the PAN Foundation?
- Will it help create a working environment in which the PAN Foundation can succeed over the long term?
- Is the commitment I am making one I can follow through with?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if my decision or action made the headlines?
- Am I acting with integrity and respect for the PAN Foundation, my family, and myself?
- What would I tell my child to do?
- Is this the right thing to do?



Values in practice

INTEGRITY

Complying with all laws, regulations, and policies

We believe

The success of our charitable mission requires rigorous compliance with all relevant laws, regulations, guidelines, and policies.

Our commitment

In order to carry out our charitable mission, we will uphold and model the highest levels of integrity and compliance with all applicable laws, regulations, government guidelines, policies, and procedures.

As an independent, public charity with a critical, life-saving mission, the PAN Foundation is committed to meeting the highest standards of compliance, integrity, and operational excellence. There are numerous laws and regulations that the PAN Foundation must adhere to as an independent charitable foundation, including but not limited to:

- Federal Anti-Kickback Statute and False Claims Act
- U.S. Department of Health and Human Services Office of Inspector General Advisory Opinion (as modified) and official guidance
- IRS tax-exempt requirements for independent charities

To provide financial assistance to patients in a compliant and ethical way, PAN must adhere to local, state, and federal laws, regulations, and government guidance. Our commitment to compliance is reinforced and upheld by our Board of Directors, who provide critical oversight of PAN's compliance initiatives and operations.

Noncompliance with laws and government guidance could result in legal ramifications, fines, and other penalties, including termination of employment. The PAN Foundation provides compliance training and written guidance, including but not limited to its Compliance Program Summary and Donor Communications Guidelines, to ensure that you uphold PAN's legal and compliance obligations.

It is crucial to be familiar with the PAN Foundation's policies. Seek guidance and report any possible violations of laws, regulations, government guidelines, policies and procedures and the Code.

INTEGRITY

Complying with the Anti-Kickback Statute

We believe

Our charitable mission requires that we comply with Anti-Kickback Statute.

Our commitment

In adherence to the Anti-Kickback Statute, we will not accept or offer payments or other forms of remuneration in exchange for taking an action on behalf of the PAN Foundation.

The Anti-Kickback Statute is an important federal law that prohibits giving or receiving anything of value in exchange for referrals for federal healthcare program business. Complying with all laws, regulations, and government guidance is vital to carrying out our mission.

You may not give or receive payments or any form of compensation in exchange for decisions made or actions taken on behalf of the PAN Foundation. Consistent with PAN's Anti-Kickback Statute policy, you must not offer, exchange, pay, solicit, or receive anything of value to induce referrals for federal healthcare programs, such as Medicare and Medicaid.

The PAN Foundation has internal safeguards to prevent behavior in violation of the Anti-Kickback Statute and provides organizational-wide training.

Maintaining independence from donors

We believe

Maintaining independence from donors in our work and operations is required to meet our organization's mission and obligations..

Our commitment

As an independent charitable foundation, we will operate free of any direct or indirect influence from donors and engage in appropriate fundraising practices.

The PAN Foundation and pharmaceutical manufacturers who donate to PAN, either now or in the future, must ensure that their interactions comply with PAN's Advisory Opinion issued by the U.S. Department of Health and Human Services Office of Inspector General (OIG) as well as with other OIG guidance concerning charitable co-pay assistance programs and all local, state, and federal laws and regulations.

PAN has internal policies and safeguards that guide its interactions with pharmaceutical manufacturers to ensure that we operate with full independence and without influence from any current or potential donor.

In your interactions with donors, you must comply with all regulations as well as PAN's internal policies that guide our ability to compliantly conduct relationships with pharmaceutical manufacturers.

INTEGRITY

Avoiding conflicts of interest

We believe

Serving patients is an important responsibility and one that requires representing the interests of PAN and its patients.

Our commitment

We will ensure that the delivery of our mission and services is free of outside influence, loyalty, or desire for personal gain and that we work in a conscientious and honest manner.

You must perform your duties in a conscientious and honest manner. You may not use your position or resulting knowledge for private or personal gain.

In addition, you may not accept entertainment, gifts, or personal favors that could, in any way, influence or appear to influence business decisions in favor of any person or organization with whom or with which PAN has business dealings.

If you believe that a course of conduct or action may involve a conflict of interest with PAN or are unsure if a particular situation could pose a conflict of interest, you should immediately disclose the facts to your supervisor or the Compliance Office.

PAN's Board of Directors, employees, and consultants are required to review PAN's Conflict of Interest policy and attest to their adherence on an annual basis.

Conducting proper relationships with contractors and suppliers

We believe

We best serve the interests of our patients when we operate free of any outside influence.

Our commitment

We will conduct proper relationships with vendors, contractors, and suppliers that prevent conflicts of interest and put the interests of our patients first.

You should not invest in or acquire a financial interest in any business organization that has a contractual relationship with PAN for your personal benefit. Further, you should not invest in or acquire a financial interest in any business or organization that provides money, goods, or services to PAN, if such investment could influence or create the perception of influencing your decisions in the performance of duties on behalf of PAN. Review PAN's Conflict of Interest Policy for full details.

INTEGRITY

Appropriately using PAN Foundation assets

We believe

We must safeguard, protect, and effectively steward our resources to deliver our mission, as entrusted to us by patients, donors, and the broader public.

Our commitment

We will steward and safeguard our organizational resources and assets with the utmost care and adherence to the highest standards of conduct.

Patients, donors, and the broader public have placed great trust in the PAN Foundation to effectively safeguard and steward our resources to deliver our mission. To that end, you must understand your role and responsibilities in making PAN financially sustainable and engaging in appropriate fundraising practices.

Financial assets:

If you are involved with PAN funds and business assets, you are obligated to follow prescribed policies and procedures for receiving, recording, handling, and disseminating PAN funds.

When your position involves committing, using, or spending PAN funds or incurring expenses on behalf of PAN, you must use good judgment to ensure that fair value is received by PAN. PAN funds and assets may not be used for personal benefit.

Internet and email:

Internet and email access using PAN equipment and resources is limited to sites and individuals as necessary to conduct PAN operations and should predominately used for business purposes. You may not use PAN equipment and resources to access either pornography or other sites that might compromise PAN's integrity and reputation.

Other business assets:

You are expected to protect and maintain PAN property or equipment and prevent equipment from being damaged, misused, or lost or stolen. PAN property or equipment should only be used for legitimate PAN activities, and not for personal benefit. You may not use PAN's identity, stationery, supplies, or equipment when engaged in a personal matter.

INTEGRITY

Keeping accurate business records

We believe

Keeping accurate business records is foundational to effective delivery of our mission and stewardship of our resources.

Our commitment

We will maintain complete and accurate business records of our operations.

Complete and accurate records are required to meet PAN's legal and financial obligations. PAN's records must reflect all business transactions in an accurate and timely manner. By meeting our commitment to accurate records, we will:

- Comply with legal and regulatory reporting obligations
- Manage our organization effectively
- Meet our obligations to our patients and stakeholder groups

If you are responsible for accounting and record-keeping, you must fully disclose and record assets and liabilities, and exercise due diligence in performing your job.

You may not make or engage in any false communication or record, internal or external, including but not limited to false expense, attendance, financial, or other reports or statements. In addition, you must comply with PAN's Records Retention and Destruction Policy.



EXCELLENCE

Allowing access to external entities

We believe

Independent audits are an essential component of achieving operational excellence

Our commitment

We will provide independent auditors or other external entities the access they need and ensure their work is conducted free of PAN's influence.

You must provide necessary access to auditors for them to effectively audit the PAN Foundation's operations.

In addition, you may not engage in any conduct that directly or indirectly misleads, improperly influences, or manipulates independent auditors or external entities that may require access.

Representing the PAN Foundation

We believe

We all have a responsibility to safeguard and uphold the PAN Foundation's reputation.

Our commitment

We commit to accurate, timely, and high-quality communications about the PAN Foundation and its work.

What we say to the public about the PAN Foundation matters a great deal to our patients and other stakeholders. Only authorized individuals are permitted to speak or otherwise communicate on behalf of the PAN Foundation. Individuals must not represent that they are speaking on behalf of PAN unless they are expressly authorized to do so, and the expressed views reflect PAN's position.

When interacting with patients, individuals, and organizations, you must meet the highest standards of conduct and take great care to not compromise the integrity or damage the reputation of PAN, or any other organization, individual, or government entity.

DIGNITY

Treating patients with respect and dignity

We believe

We should treat our patients as we would treat our loved ones.

Our commitment

We will treat patients and one another with dignity, respect, and compassion.

Helping people get access to their critical medical treatments is at the heart of our mission. When patients or their healthcare providers, family members, or caregivers come to the PAN Foundation, they may be experiencing distress, fear, and any other number of emotions, in addition to physical symptoms such as pain or discomfort from their illness.

We are committed to treating our patients the way we would want our loved ones to be treated in that situation: with dignity, respect, and compassion. Whether that's over the phone, online messaging, or even our website, we strive to offer an experience that treats every individual with dignity and respect.

Patients are always people to us first.

Responding to requests for information

We believe

Trust is built in part by providing accurate, complete, and timely information in response to external requests.

Our commitment

We will provide accurate, complete, and timely information in response to requests.

Providing accurate, complete, and timely responses upon requests for information is an important obligation for PAN to carry out its mission, build trust, and care for its patients.

Whether the request comes from patients, healthcare providers, donors, government entities or other stakeholders, you must make every effort to provide accurate, complete, and timely information.

You are obligated to respond in a courteous and prompt manner to all appropriate requests for information and complaints.

DIGNITY

Protecting privacy and confidential information

We believe

Protecting the privacy of our patients and our operations is one way that we demonstrate our compassion.

Our commitment

We will protect confidentiality and privacy of information.

We are committed to protecting the confidentiality and privacy of information. When handling financial, healthcare, and other personal information, you must observe the following principles:

- Collect, receive, use, and retain only information that is necessary to conduct PAN's operations.
- Whenever possible, you will obtain needed and relevant information directly from an individual, as opposed to a third party. To the extent that a third party is involved, engage only reputable and reliable sources to obtain necessary information.
- Although PAN may not be a "covered entity" under the Privacy Provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), we comply with several of the requirements and handle protected health information (PHI) in accordance with the law and regulations.
- PAN will provide financial, healthcare, or personal information only to those with a legitimate business reason for obtaining that information. PAN will use financial, healthcare, or personal information only for the purpose for which it was obtained and will obtain the consent of an individual before externally disclosing any financial, healthcare, or personal information, unless legal or contractual obligations require otherwise.

You must exercise good judgement and use an appropriate level of confidentiality about PAN's activities and operations.



INTENTION

Fostering a respectful and inclusive workforce

We believe

Diversity, equity, inclusion, and collaboration are critical to PAN's success and that respect is the foundation.

Our commitment

We will foster a diverse, equitable, and inclusive environment where people of all backgrounds and identities are respected and valued and feel a sense of belonging.

The PAN Foundation is committed to a diverse, inclusive, and equitable environment where all Board members, staff, and volunteers feel respected and valued regardless of gender, age, race, ethnicity, national origin, sexual orientation, gender identity, disability, education, or any other bias. Listening to, respecting, and valuing the diverse life experiences of those who work for and on behalf of PAN have a positive impact on the organization.

We all deserve to work in an environment where we are treated with dignity and respect. PAN is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our success. We cannot afford to let anyone's talents go to waste.

All PAN employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect at all times.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Seek out insights from employees with different experiences, perspectives and backgrounds.
- Avoid slang or idioms that might not translate across cultures.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.

INTENTION

PAN is committed to nondiscrimination and providing equal opportunities for employment, contracting, volunteering, and advancement in all areas of our work.

In addition to fostering a positive workplace, PAN has policies in place to ensure that we are following all legal and fair employment practices; maintaining a safe and secure workplace; and ensuring all employees receive the training, resources, and support needed to perform to the best of their abilities.

Prioritizing anti-discrimination

We believe

PAN can only thrive when every individual can thrive—and that requires a workplace that actively fosters respect and rejects discrimination and bias

Our commitment

We will respect every individual and ensure our workplace is free of discrimination and work to reduce unintentional bias.

At the PAN Foundation, we believe in creating a respectful environment that prioritizes diversity, equity, inclusion, and belonging. To achieve this, we prohibit any form of discrimination in all aspects of employment, including recruitment, hiring, training, promotions, compensation, or any other aspects of work.

We prohibit discrimination against individuals based on:

- Race or ethnicity
- National origin or language of origin
- Religion
- Sex (including pregnancy and childbirth)
- Sexual orientation
- Gender (including gender identity and gender expression)
- Age
- Disability
- Genetic information
- Political beliefs

We believe that a diverse, inclusive, equitable, and respectful work environment is essential to achieving our mission and promoting the well-being of our employees.

PAN is committed to providing a professional work environment free from discrimination and harassment, including discrimination and harassment based on a protected characteristic, and an environment free from retaliation for participating in any protected activity.

Accordingly, we have adopted and maintain an anti-discrimination policy designed to encourage professional and respectful behavior and prevent discriminatory and harassing conduct in our workplace. We will implement appropriate corrective actions up to and including termination, in response for misconduct--including violation of our anti-discrimination policy, even if the violation doesn't rise to the level of unlawful conduct.

Discrimination may include but is not necessarily limited to: hostile or demeaning behavior towards applicants or employees because of their protected characteristic; allowing the applicant's or employee's protected characteristic to be a factor in hiring, promotion, compensation or other employment related decisions unless otherwise permitted by applicable law, and providing unwarranted assistance or withholding work-related assistance, cooperation, and/or information to applicants or employees because of their protected characteristic.



INTENTION

Ensuring professional conduct

We believe

Ethical, moral, and professional behavior is core to who we are and essential to our success.

Our commitment

We will act with professional and personal integrity to our colleagues and all who we encounter as we conduct PAN-related activities.

Unprofessional conduct, activities, or any form of harassment while representing PAN are prohibited. The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of the policy

Unprofessional conduct includes, but is not limited to:

- Unwelcome, disrespectful, or unprofessional conduct based on protected characteristics, including verbal conduct (such as teasing, slurs, or jokes) or visual conduct (such as sharing offensive cartoons, drawings, or emails)
- Engaging in or using inappropriate actions, language, or materials
- Using drugs or alcohol
- Engaging in inappropriate relationships
- Creating a hostile work environment

Mia Harmon, JD

Chief Compliance & Privacy Officer
mharmon@panfoundation.org



About the PAN Foundation

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To learn more, visit panfoundation.org.