



BLUE SKY SPECIALTY PHARMACY

("BLUE SKY")

ETHICS & COMPLIANCE STATEMENT

At Blue Sky, we expect excellence and quality in all that we do. We consider compliance with good business practices to be our top priority and we are committed to upholding the highest standards of ethics in our relationships with patients, payors, employees, and the public. Accordingly, Blue Sky conducts its operations consistent with the following two foundations:

PATIENT CARE AND COMPLIANCE WITH ALL LAWS (OUR "COMPLIANCE MANDATE").

Because we maintain a zero-tolerance policy for any violation of our Compliance Mandate, our employees, contractors, and affiliated persons are required to only act consistent to best patient care concerns and fully comply with all laws and other compliance requirements. We will not be involved in any business opportunity that presents with unethical or illegal activity.

To implement our Compliance Mandate, our compliance program takes into account the seven elements of an effective compliance program, including: (1) written standards of conduct and policies and procedures that promote commitment to compliance; (2) a Compliance Officer(s) to oversee the program; (3) compliance education and training for all new hires, with annual training for staff; (4) processes to receive complaints and to allow complaints from staff without any fear of retaliation (to our Compliance Email: compliance@bssprx.com, or Compliance Hotline: 877.507.1635); (5) responding to allegations of improper activities and, when necessary, developing a corrective action plan; (6) auditing and monitoring to identify areas of potential risk; and (7) investigation and remediation of identified systemic problems and non-employment of sanctioned individuals.

In order to preserve and enhance our Compliance Mandate and the preceding elements, we have developed various policies and compliance practices, including adoption of our Code of Ethics and Business Conduct ("Code"). The Code applies to all Blue Sky employees, contractors, suppliers, and officers and is designed to provide our employees with guidance regarding compliance with laws, regulations and Company policies. We regularly communicate with employees regarding the Code to ensure familiarity and awareness, and we require that employees annually certify their agreement to abide by policy.

The Code and stand-alone policies also contain specific anti-retaliation provisions intended to protect employees who step forward. We encourage open communication of concerns and we are committed to protecting anyone providing a good faith report of inappropriate business practices. Retaliation against anyone making a report or participating in an investigation will result in disciplinary action.

Separate from the Code, we provide our workforce with ongoing training and targeted to employee roles and functions. Training may be provided in person or online and addresses compliance topics such as anti-kickback, false claims, stark, improper inducements, and other laws and further cover conflicts of interest, privacy, anti-discrimination, anti-corruption and guidelines with regard to, for example, gifts and hospitality to patients. Completion of required training is tracked and refreshed on a regular basis. We also require periodic certifications by management level employees

regarding adherence to Company policy and various compliance topics. These practices act to supplement the Code and provide topic specific guidance to employees.

Finally, Blue Sky recognizes the importance of appropriate oversight of potential business risks in running a successful operation and meeting our obligations to our patients, payors, Practitioners and the public. We are responsible for creating an appropriate culture of risk management. Accordingly, we take an active role in overseeing our aggregate risk potential and address specific risks, including competitive, legal, regulatory, operational and financial risks.

In summary, our Compliance Program has the commitment of everyone at Blue Sky to: (1) provide education, policies and tools regarding best patient care and compliance with all laws, (2) conduct periodic investigations and always respond to any indication of Misconduct, (3) take part in monitoring Company activities including internal audits to assess risk, and (4) provide a proactive approach to compliance in order to maintain Blue Sky Compliance Mandate; in short, we always act to ensure best patient care and compliance with all laws and ethical standards.

CURT NESBITT, CEO