

Neighbor Care Pharmacy Inc.

Conflict of Interest Policy - Prime Therapeutics Compliance

Effective Date: 01/01/2024

Location: 2315 65th Street, Brooklyn, NY 11204

Phone: 718-336-4772

Fax: 718-336-9069

Purpose

To define and manage conflicts of interest to ensure the integrity, impartiality, and compliance of pharmacy operations with Prime Therapeutics and affiliated plans.

Scope

This policy applies to all employees, contractors, and agents of Neighbor Care Pharmacy Inc. who are involved in dispensing, billing, clinical services, or other activities related to Prime Therapeutics.

Definition of Conflict of Interest

A conflict of interest occurs when personal, financial, or other outside interests compromise, or appear to compromise, an individual's ability to make unbiased decisions in the best interest of the pharmacy and its patients.

Examples include:

- Financial interest in vendors or competitors
- Family relationships influencing purchasing or referral decisions
- Accepting gifts or incentives from manufacturers or suppliers
- Side jobs or consulting roles with conflicting interests

Policy Guidelines

- Disclosure Requirement: All employees must promptly disclose any actual or potential conflicts of interest to the Pharmacy Manager or Compliance Officer.
- Review & Resolution: Disclosures will be reviewed and assessed to determine if mitigation or removal of the conflict is necessary.
- Prohibited Activities: Employees may not:
 - Engage in self-dealing or biased decision-making
 - Use confidential information for personal gain
 - Accept gifts exceeding \$15 or \$75 annually from any single entity
- Annual Attestation: All employees must complete an annual conflict of interest disclosure

and sign an attestation form affirming compliance.

- Ongoing Monitoring: Management will monitor for conflicts throughout the year and update the conflict of interest register as needed.

- Retaliation Prohibited: Retaliation against any employee who discloses a potential conflict in good faith is strictly prohibited.

Oversight

The Compliance Officer and Pharmacy Manager are responsible for enforcing this policy and maintaining records of disclosures.

Approved By: Joseph Lasker

Title: Pharmacy Manager

Date: 01/01/2024