



GF HEALTH PRODUCTS, INC. ETHICS POLICY AND CODE OF CONDUCT

POLICY

GF Health Products, Inc. (“GF”) team members, including employees, officers, directors and independent representatives, will maintain the highest ethical standards in the conduct of the company’s affairs. It is the express intent of this policy that each team member conducts GF’s business with integrity, honesty and loyalty in reference to fellow team members, customers, vendors and the company as a whole.

CODE OF CONDUCT

The company believes in ethical and fair competition. Graham-Field brands are sold based on their superior quality, functionality, competitive price and customer service behind each and every product. All company team members are expressly prohibited from offering or soliciting improper payments or gratuities in connection with the purchase of goods or services for GF or in the sale of GF products.

GF pledges to serve every customer with the highest levels of sincerity, fairness, courtesy, respect and gratitude, delivered with unparalleled responsiveness, expertise, efficiency and accuracy. We are in the business to create lasting relationships, and we will treat our customers like we want to be treated.

GF’s customers, vendors and others, with whom we do business, entrust our company with important information relating to their businesses. The company does not disclose confidential information to external parties or to GF team members without a “need to know” other than under process of law. Team members are reminded that there is a need for discretion at all times. This policy is not intended to inhibit normal business communications.

GF shall not knowingly establish a relationship with a team member that has ever been (1) convicted of a criminal offense related to health care and/or related to the provision of services paid for by Medicare, Medicaid or another federal health care program; (2) excluded or debarred from participation in any federal health care program, including Medicare and Medicaid; or (3) otherwise sanctioned by the federal government, including being listed on the General Services Administration’s Excluded Party Listing System. Should a team member be convicted of such an offense, this fact must be immediately communicated to the corporate Human Resources department.

As an Equal Opportunity Employer, GF provides full employment opportunities to all qualified persons without regard to race, color, gender identity or expression, age, religion, intellectual disability, mental disability, medical condition, handicap, physical disability, including but not limited to blindness, unless it is shown that such disability prevents performance of the work involved, national origin, ancestry, sexual orientation, marital status, domestic partnership status, parental status, military status, veteran or military discharge status, source of income or housing status or any other distinction outlined by any applicable federal, state and local laws.

GF Health Products, Inc. is a drug free workplace