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ALLSCRIPTS CODE OF SUPPLIER CONDUCT

INTRODUCTION

As a healthcare information technology company, Allscripts Healthcare Solutions, Inc. and its affiliates (“Allscripts”) are committed to improving the lives of people around the world. Allscripts is a leader in healthcare information technology solutions that advance clinical, financial and operational results. Our innovative solutions connect people, places and data across an Open, Connected Community of Health™. Connectivity empowers caregivers to make better decisions and deliver better care for healthier populations. Allscripts is one of the largest public companies focused exclusively on healthcare information technology globally. Allscripts is divided into numerous business units and offers healthcare providers, payers and life sciences companies globally a complete portfolio of clinical, financial, population health management, transaction and managed IT services and other solutions. As of December 31, 2017, approximately 75,000 physician practices, 3,400 hospitals and 100,000 coordinated community care organizations use our innovative products and services. Allscripts operates in 13 countries through local subsidiaries, including Australia, Canada, India, Israel and the United Kingdom.

As part of our global commitment, Allscripts strives to achieve and maintain the highest possible standards of corporate integrity and ethical behavior. A Connected Community of Health™ can only be achieved and sustained if it is built on a solid foundation of leadership, strategies, and business practices that are safe, fair, respectful, honest, responsible, ethical, and lawful. We adhere to the highest moral and legal principles and embrace the ALLSCRIPTS PROMISE:

“To be worthy of our clients’ trust and partnership, we must uphold the highest levels of business ethics and personal integrity in all interactions and transactions.”

Allscripts believes that business relationships are more productive and mutually effective when they are connected through respect, trust and shared common values. Allscripts seeks Suppliers who share our common commitment to:

- Complying with the spirit and letter of the laws, regulations, and industry best practices;
- Protecting human, labor and employment rights;

- Displaying exemplary ethical and business conduct;
- Establishing compliance guidelines for privacy and security protection; and
- Promoting steady improvement and facilitating compliance by implementing effective management systems.

As our business partners, Allscripts believes that the Allscripts Promise applies to its Suppliers and expects that its Suppliers will conduct their business not only in a lawful manner but also in compliance with the same high standards of integrity and ethics. To ensure these ethical standards are met, Allscripts provides this Code of Supplier Conduct to guide Suppliers on their business activities in concert with and on behalf of Allscripts. Allscripts Suppliers are expected to take reasonable and necessary steps to help ensure that their subcontractors and sub-suppliers conduct business in compliance with this Code of Supplier Conduct. This Code is not meant to be exhaustive. Allscripts reserves the right to amend, modify and add to this Code of Supplier Conduct from time to time as Allscripts, in its sole discretion, when deemed appropriate.

ENSURING ACCOUNTABILITY

Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this Code of Supplier Conduct. This includes the following:

COMMITMENT AND ACCOUNTABILITY

As a condition of contracting with Allscripts, Suppliers and their employees and agents are required to review the Code of Supplier Conduct on an annual basis and be knowledgeable of and adhere to it in its entirety. Suppliers are responsible for monitoring compliance with the standards set within the Code of Supplier Conduct. Suppliers are expected to seek guidance from Allscripts when questions arise involving unethical business conduct pertaining to company business and inappropriate behaviors.

Suppliers are encouraged to fulfill the expectations set forth in this Code of Supplier Conduct by allocating appropriate resources. Suppliers shall identify company representatives

responsible for ensuring implementation and periodic review of its compliance management systems.

IDENTIFICATION OF CONCERNS & WHISTLEBLOWER PROTECTIONS

The ability for employees to raise integrity and ethical concerns is essential to maintaining accountability and compliance to the Code of Supplier Conduct. Suppliers are required to establish a process for employees to raise concerns about compliance with the Code of Supplier Conduct. This process should allow employees to report concerns anonymously, if they so choose. Suppliers should encourage their employees to raise concerns early; the longer they wait to address a concern, the worse the situation may become. Suppliers should respect an employee's confidentiality to the extent possible while investigating and resolving reported concerns.

A Supplier's compliance reporting process must prohibit retaliation against any employee ("whistleblower") who honestly raises an issue of concern. The employee may not be subject to any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination based on their report. Employees who have raised a concern in good faith should continue to be treated with courtesy and respect. If a Supplier's employee believes they have been subject to retaliation, they should report the matter to the company's designated compliance officer or the Allscripts Chief Compliance Counsel immediately. The Allscripts Global Compliance Hotline can be reached at 866.353.6238 for calls originating within the United States or +1 512 623 2255 for calls originating outside the United States. Retaliation against an employee for honestly raising a concern should be considered grounds for discipline up to and including dismissal.

TRAINING AND COMPETENCY OF CODE OF SUPPLIER CONDUCT

Allscripts Suppliers will establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of this Code of Supplier Conduct, applicable laws & regulations, and generally recognized standards. Such training measures should include education on the Supplier's process for reporting ethics or compliance concerns and the Supplier's non-retaliation policy that protects employees who raise an ethics or compliance concern in good faith.

RISK MANAGEMENT OF AREAS ADDRESSED BY CODE

Suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Code of Supplier Conduct and with respect to all applicable legal requirements.

DOCUMENTATION ON CODE COMPLIANCE

Suppliers are expected to develop adequate documentation to demonstrate that they share the principles and values expressed in this Code of Supplier Conduct and follow it accordingly. This documentation may be reviewed by Allscripts upon agreement. Such documentation should be maintained for the entire length of a Supplier's contractual relationship with Allscripts and at minimum 6 years thereafter. Suppliers shall maintain integrity, transparency and accuracy in its corporate record keeping.

MONITORING AND COMPLIANCE

To ensure a Supplier's compliance to these Standards, Allscripts reserves the right to monitor our Suppliers through, on-site assessments of facilities, use of questionnaires, review of available information or other measures necessary to review Supplier's performance.

Suppliers are expected to cooperate with the investigation of a suspected violation of this Code or violation of any applicable governmental law or regulation. In addition, as required and/or appropriate, the Allscripts Chief Compliance Counsel may disclose investigation matters to applicable law enforcement or regulatory entities.

PENALTIES FOR VIOLATIONS

Allscripts reserves the right to disqualify any potential Supplier or terminate any relationship with a current Supplier that has failed to conform to the Allscripts Code of Supplier Conduct.

OPERATING WITH BUSINESS INTEGRITY

Our business is highly competitive by nature. Allscripts strives to be the leading health information technology company by striving to achieve and maintain the highest possible standards of corporate integrity and ethical behavior. As such, our Suppliers are expected to uphold our strong stance against unethical business practices and to behave in a manner consistent with these high ethical standards. This includes:

DISPLAYING EXEMPLARY ETHICAL AND BUSINESS INTEGRITY

Allscripts expects the highest standards of ethical conduct in all our endeavors. Suppliers shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations.

Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions such as the U.K. Bribery Act, the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions ("OECD Bribery Convention") and its local country enabling legislation; and any anti-corruption and anti-bribery laws, rules and regulations in all the jurisdictions in which Supplier transacts business. Suppliers or any member of their family shall not engage in public or private corruption, extortion, embezzlement, kickbacks, or bribery to obtain an unfair or improper advantage. Suppliers or any member of their family will also not accept bribes or other unlawful incentives from their business partners. Suppliers are expected not to offer Allscripts employees gifts or any other kind of personal benefit resulting from the relationships with the Supplier. Suppliers must immediately notify Allscripts in the event they become aware of any behavior that violates or is likely to violate any aforementioned and/or applicable anti-corruption laws not called out within this Code.

FAIR COMPETITION AND INDUSTRY BEST PRACTICES

Allscripts Suppliers shall conduct all business dealings in a fair & transparent manner and uphold fair business standards in advertising, sales, and competition in accordance with all applicable anti-trust laws. Furthermore, Suppliers shall ensure all statements, communications

and representations to Allscripts are accurate and truthful. Suppliers are prohibited from making agreements or taking actions that unreasonably restrain trade, are deceptive or misleading, or that unlawfully reduce competition. Suppliers must comply with the commercial best practices established by the Supplier's industry.

CONFLICT OF INTEREST

Suppliers must conduct their business interactions and activities with integrity and must, without limitation, avoid the appearance of or actual improprieties or conflicts of interests. Suppliers are required to disclose to Allscripts any conflict of interest with respect to Allscripts business interests. Suppliers must immediately inform Allscripts if any employee of the Supplier, or their family member, has a relationship with an Allscripts employee who can make decisions that will affect the Supplier's business, or if any Allscripts employee, or their family member, may have an interest of any kind in the Supplier's business or if any kind of economic ties exist with the Supplier.

PROPER USE OF COMPANY ASSETS

Suppliers shall ensure that Allscripts' corporate assets are used only for valid business purposes. Corporate assets include not only our equipment, funds and office supplies, but also concepts, intellectual property, business strategies and plans, financial data, and other information about Allscripts' business. These assets may not be used to derive personal gain.

ETHICAL TREATMENT OF ANIMALS

Suppliers shall treat any animals used in its activities in an ethical and humane manner and follow the principles of replacement, refinement and reduction of laboratory research animal testing.

PROTECTING EMPLOYEES

CHILD LABOR AVOIDANCE

Allscripts values people as its most vital asset. As part of the effort to eradicate human trafficking and child labor, Allscripts has a zero-tolerance approach to this behavior. Suppliers must not employ any person younger than the legal minimum age for working in the jurisdiction in which such person is employed and must comply with all applicable minimum legal age requirements and other applicable child labor laws. Suppliers should avoid any sort of child labor in their business operations consistent with the International Labour Organization's (ILO) core labor standards and the United Nations Global Compact principles.

FREELY CHOSEN EMPLOYMENT

Suppliers must not support, promote or engage in the practice of slavery or human trafficking, and Suppliers must comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Additionally, the materials incorporated into Supplier's products must comply with the laws regarding slavery and human trafficking of the country in which they are doing business. Please refer to the Allscripts Modern Slavery Act Statement for further information.

Allscripts believes that a person should be free to make their own decisions, therefore, Suppliers shall not engage in forced, bonded, or involuntary prison labor. Suppliers shall not hide, destroy, confiscate, or otherwise deny employees, contractors or subcontractors access to such person's identity or immigration documents, to force the person to stay longer than they desire.

INCLUSION AND NON-DISCRIMINATION

Allscripts wishes to work with Suppliers who are fully inclusive and provide equal employment opportunity. Suppliers shall support diversity and provide a work environment that is free from discrimination based on race, color, national origin, gender, religion, age, nationality, disability, social or ethnic origin, pregnancy, political affiliation, union membership or marital status, veteran status, or other factors prohibited by applicable laws and regulations.

FAIR TREATMENT

Suppliers shall protect employee's rights to fair and equal treatment in the workplace and shall not threaten nor treat an individual harshly or inhumanely. Harsh or inhumane treatment includes sexual harassment or abuse, corporal punishment and/or coercion, as well as other forms of physical, mental and emotional abuse. All conditions of employment by Suppliers shall be based upon an individual's merit and ability to perform the responsibilities of the job. Suppliers shall not use misleading or fraudulent recruiting practices, including the use of recruiters that do not comply with local labor laws in the country where the recruiting takes place, charge recruiting fees, expect workers to pay for a job, provide housing that does not meet the standards of the country where work is performed, or if required by law, they fail to provide an employment contract or recruitment agreement. Suppliers must transport an employee back to the country they came from, if the Supplier physically transported or paid to transport an employee, contractor or subcontractor from another country to the country where such employee will perform work.

WORKING HOURS, WAGES AND BENEFITS

Suppliers are required to provide compensation, including regular wages and overtime hours, and legally mandated benefits, in accordance with all applicable laws and standards. Compliance with all applicable laws governing the number of maximum work hours, vacation time, leave periods and holidays is required of all Suppliers. Additionally, Suppliers' shall not allow employees to work beyond the maximum working hours permitted by applicable law. According to applicable laws, Suppliers will compensate for employees who work overtime. Suppliers must respect workers' rights to rest and leisure and avoid unsafe working conditions by providing sufficient rest periods during the workday, honor agreed upon days off from work and maximum working hours.

FREEDOM OF ASSOCIATION

Suppliers must allow workers the right to make informed decisions free of coercion, threat of reprisal or unlawful interference regarding their desire to associate freely, join or not join organizations or to peaceful assembly. Suppliers shall respect workers' rights to engage in collective bargaining, without unlawful interference.

SAFE, HEALTHY, AND HARASSMENT-FREE WORK ENVIRONMENT

Allscripts insists that their Suppliers treat people with dignity and respect. Suppliers shall maintain workplaces, and any living quarters used to house employees, in a clean, orderly and safe manner. In accordance with this Code, Suppliers are responsible for maintaining a healthy, clean and safe work environment and shall not implement or utilize mental or physical disciplinary practices. Workers shall be free from any form of harassment. Supplier must ensure that employees have freedom of movement within their place of employment and are free to leave their employment upon reasonable notice. It is the Suppliers responsibility to establish and publish written safety and health policies and systems to minimize work--related injury and illness. Workers shall be encouraged to raise concerns in the workplace through a grievance process or other safe reporting mechanism and Suppliers shall prevent retaliation.

SUPPLIER DIVERSITY

Allscripts has committed itself to improving the lives of people around the world and believes that understanding diversity is key in their success. Allscripts knows that if the communities we live in prosper and succeed then we all benefit. In furtherance of this concept, Allscripts has developed a Supplier Diversity Program to recognize diverse Suppliers and to collaborate with them to help us achieve success. Allscripts requires their Suppliers to also support their communities through utilization of diverse Suppliers.

ADHERING TO APPLICABLE LAWS & REGULATIONS

At a minimum, Suppliers must conduct business in accordance with all applicable country, state, and local laws and regulations covering the jurisdictions in which they operate. Allscripts reserves the right to decline to deal with Suppliers who do not comply with the law.

ADHERENCE TO ALLSCRIPTS FRAUD & ABUSE AND INTERACTIONS WITH HEALTH CARE PROFESSIONALS GUIDELINES

It is the policy of Allscripts to:

- obey all relevant laws relating to liability for false claims and statements,
- to implement and enforce procedures to detect and prevent fraud, waste, and abuse regarding payments from government healthcare programs,
- and to provide protections against reprisal or retaliation for employees who report actual or suspected wrongdoing.

The Allscripts Guidelines for Interactions with Health Care Professionals (HCPs) were crafted in a manner to help the company comply with U.S. Anti-Kickback and False Claims laws. These Guidelines cover meals, entertainment, gifts, events, discounts, rebates, concessions, charitable donations, sponsorship, reference sites, and consulting services. Allscripts employees are expected to know and follow the company's Guidelines for Interactions with HCPs. Allscripts employees may not offer or provide anything of value with the intent of directly or indirectly influencing or encouraging the recipient to purchase or recommend an Allscripts solution, or as a reward for doing so. They must avoid any action that could inappropriately influence the medical decisions of health care professionals and the purchasing decisions of entities that buy our products and services, including health care professionals, government regulators and inspection authorities.

Suppliers are required to take similar measures to protect against violations and to follow Allscripts Guidelines on Interactions with Healthcare Professionals. Suppliers must report immediately any allegation of violations of laws, regulations or policies involving a Supplier and/or the Supplier's personnel, including allegations of FWA involving federal or state health care programs. Allscripts Suppliers are required to protect people who report the noncompliance and are expected to fully cooperate in such investigations and, where appropriate, in taking corrective actions in response to confirmed violations.

INSIDER TRADING

Supplier shall prohibit persons (including but not limited to employees, board members, and family members) who are aware of nonpublic information from disclosing this information to others who may use that knowledge to trade a company's securities. See Allscripts Insider Trading Policy for further information.

FOOD & DRUG ADMINISTRATION

With respect to the resale of products that are devices regulated by the Food & Drug Administration (FDA) in the U.S., Supplier must follow the Allscripts Marketing Guidelines to maintain compliance with FDA regulations.

MAINTAINING THE HIGHEST STANDARDS OF PRIVACY, SECURITY, AND CONFIDENTIALITY

PRIVACY & INTELLECTUAL PROPERTY

Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

CONFIDENTIAL INFORMATION

Suppliers will safeguard any confidential information, including (but not limited to) competitively sensitive information, concerning Allscripts, its clients, and its business partners they obtain access through their relationship with Allscripts. Suppliers can not divulge confidential information unless they are authorized to do so by Allscripts. Access to confidential information should be restricted to those employees and contractors who require it for the performance of their duties.

Suppliers are required to comply with local and applicable domestic and international laws when collecting and storing personal information about Allscripts employees, business partners, patients, health care professionals, consumers and others, such as birth dates, addresses and other sensitive information.

Suppliers are expected to comply with any non-disclosure agreement executed with Allscripts. Suppliers' obligation to treat information as confidential does not end when the partnership with Allscripts has concluded. Suppliers and their employees or contractors may not disclose confidential information after ceasing the Supplier's contract with Allscripts or if a Supplier's employee or contractor ceases their relationship with the contractor.

Suppliers are obligated to report any incident that they may be aware of that could compromise the confidentiality, integrity, or availability of the information they have been given access to by Allscripts.

ESTABLISHING COMPLIANCE GUIDELINES FOR PRIVACY & SECURITY PROTECTION

Allscripts takes its responsibilities in protecting confidential medical information very seriously. The company is committed to meeting patient privacy standards in all countries in which it operates. All Suppliers are required to protect individual health information obtained by Allscripts at all times. Suppliers are responsible for ensuring all Supplier personnel who provide services on behalf of Allscripts and its customers, are aware of and familiar with the requirements of both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules and, where applicable, those state laws that provide more stringent protection of Patient Health Information (PHI) and personally identifiable information (PII). Supplier shall implement role-appropriate periodic training and assessments on cybersecurity for all Supplier personnel who provide services to network connected devices. In addition, the Supplier must ensure all reasonable and customary industry accepted actions are taken to ensure their respective devices are protected and malware free prior to installation and or use.

Collect personal information shall ONLY be for legitimate business purposes, shared only with those individuals who require it to conduct their professional duties, protected in accordance with security policies, retained only for as long as necessary. Suppliers shall contractually obligate third parties with access to personal information to follow the privacy & security protections required by this code.

Suppliers and their contractors are required to immediately notify Allscripts of any breach in the privacy or security of the PHI they obtained through their business relationship with Allscripts. Any breach of a Supplier's obligation to maintain the highest standards of privacy and security of PHI and PII will be viewed by Allscripts very seriously and could, if deemed appropriate, result in termination of the contract. Allscripts has the right to audit Supplier's security controls to ensure that privacy & security compliance meets expectations.

REFERENCES

EXTERNAL RESOURCES

1. International Labour Standards (ILO): <http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org>
2. United Nations Global Compact: <http://www.unglobalcompact.org>
3. Foreign Corrupt Practices Act: <https://www.justice.gov/criminal-fraud/foreign-corruptpractices-act>
4. UK Bribery Act: <https://www.legislation.gov.uk/ukpga/2010/23/contents>
5. OECD: <http://www.oecd.org/>
6. Modern Slavery Act 2015: www.legislation.gov.uk/ukpga/2015/30/contents/enacted
7. Title VII of the Civil Rights Act of 1964: <https://www.eeoc.gov/laws/statutes/titlevii.cfm>
8. US Anti-Kickback: <https://www.gpo.gov/fdsys/pkg/USCODE-2010-title42/pdf/USCODE-2010-title42-chap7-subchapXI-partA-sec1320a-7b.pdf>
9. False Claims Act: <https://www.gpo.gov/fdsys/pkg/USCODE-2011-title31/pdf/USCODE-2011-title31-subtitleIII-chap37-subchapIII-sec3729.pdf>
- 10.

Health Insurance Portability and Accountability Act:

- <https://www.gpo.gov/fdsys/pkg/CFR-2011-title45-vol1/pdf/CFR-2011title45-vol1-part164.pdf>
- www.hhs.gov/hipaa/for-professionals/security/lawsregulations/index.html
- <https://www.hhs.gov/hipaa/for-professionals/privacy/index.html>
- <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

ALLSCRIPTS-SPECIFIC RESOURCES

1. Allscripts Information Privacy & Security Policies: Vendor Security Policy
2. Allscripts Modern Slavery Act Statement
3. Allscripts Insider Trading Policy

4. Allscripts Marketing Guidelines
5. Allscripts Guidelines for Interactives with Health Care Professionals