

“**THE BEST IDEAS
THAT PUT OUR HEALTH
FIRST WIN.**”



OUR WORLD WIDE BUSINESS CODE OF CONDUCT

Version 1.9.129

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Helping people **Live Healthier, Live Longer**
and **Happier.** That is **What We Do.**





Celebrating **People** and their
Life that is **Who We Are.**





iHug's vision is to be the **World's** most **Loved Brand**,
by offering intuitive and unique **Health Care Tools**
to **Everyone, Anywhere.**





OPEN LETTER ON DISCRIMINATION AND BELONGING

In light of the recent success Airbnb has achieved in its commitment to the prevention and education of discrimination among their community of users. I would agree that iHug's fundamental beliefs align with Airbnb along with Apple and others. iHug was built from the heart and we believe in openness and acceptance of all people from all over the world.

Here's Airbnb's Commitment Statement:

"We believe that no matter who you are, where you are from, or where you travel, you should be able to belong in the Airbnb community. By joining this community, you commit to treat all fellow members of this community, regardless of race, religion, national origin, disability, sex, gender identity, sexual orientation or age, with respect, and without judgment or bias."

When people are discriminated against because of their inherent characteristics, everyone loses, and it sets us all back. We have differences and similarities that can benefit everyone, but only when we come together. When we come together unity is born, and unity will only push us forward.

I would like to take this moment to officially make public our Culture here at iHug. We believe in each other, each other's education, our invaluable talents, life experiences and our inherent characteristics.

It encourages togetherness, and together, anything is possible.

A handwritten signature in black ink, appearing to read 'Adam John'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Adam John
Founder, Chairman, and
Chief Executive Officer



OUR MAGICAL CULTURE

iHug embraces diversely rich people to leverage the collective mixture of individual differences and similarities, which will improve our business outcomes, workforce, marketplace and communities.



We all have inherent characteristics such as age, religion, national origin, disability, sex, gender identity, culture, sexual orientation and physical appearance.

When mental barriers are created by judging others for any reason, it is not conducive to achieving a world-class environment at iHug, Inc.

Making judgmental statements or jokes, viewing a team member in a bias way, jeopardizes our culture and the progress of humanity.



As well as values and beliefs from religion, attitudes, lifestyles, political views and many other facets of diversity.

Every team member can grow and learn from one another regardless of their inherent characteristics. Together we are stronger, more creative and keep alive our diversely dynamic synergy.

We believe diverse teams are better at solving complex problems. They enjoy a more cohesive and uplifting workplace. Where people can openly be themselves, bringing out the best in them.



Along with the added experience from our personal and educational backgrounds.

We unite with one another in our common goal of changing our understanding of healthcare, not through technology but through our human connection and interactions.

Our company's fundamental strength is to proactively focus on human health through a diverse array of products and services.



OUR MAGICAL TOUCH

OUR STRATEGIC VISION:

Deliver substantially more value than any company in the world by recruiting the smartest people with humanitarian values.

OUR CORPORATE GOAL:

Create long-term value by serving our stakeholders, taking appropriate risks, and leveraging our trademarks and patents.

OUR VALUES:

- Celebrate People, Life and Love
- Accountability
- Inclusive diversity
- Impact the world
- Always move fast
- Technology engagement
- Deliver happiness
- Caring, honesty and integrity

OUR PRIORITIES:

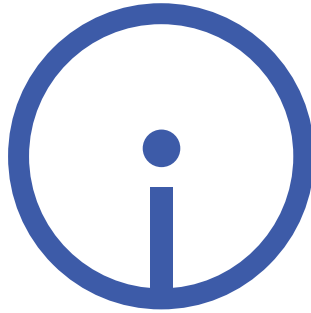
- Focus on our users
- Sustainable growth
- Enterprise risk and return
- Operational excellence
- Capital management
- Technology management

OUR OPERATING PRINCIPLES:

- Putting our users at the core of our platform
- Employ user analytics, data science, and state-of-the-art technology to generate growth and attractive economic return
- Execution strategies based on precision and efficiency
- Focus relentlessly on objectives that have the greatest impact
- Hitting milestones by celebrating our employees and their talents
- Work as a single unit within our enterprise

LEADERSHIP PRINCIPLES:

- The best ideas win
- We drive results
- We drive ingenuity
- We lead mobile applications
- We are here to serve users
- We develop together



OUR FOUNDERS MESSAGE

Over the last several years, we've spent thousands of hours planning, engineering and patenting the iHug Ecosystem. I truly believe we have something special, innovative, intuitive and revolutionary.

It's amazing, when people come together for a noble cause, magic happens. We've not only developed a product, we developed a tool. A tool that offers people robust health. So that people can take control of their health. It simplifies complex problems and makes it easy for everyone. It's like nothing you've experienced, and I want it to be part of everyone's life.

Very few companies are gifted with something that has the potential to transform entire industries, while having a profound and positive impact on the world. Whether that opens the doors to new ideas, creates new markets and jobs or changes the direction of society. I believe iHug has boundless potential and we're working around the clock to deliver the best experienced you've ever had with anything.

In order to deliver a great experience and mobile application, we've created an extremely demanding environment here at iHug. Good is the enemy of great, the reason something is not great is because it's just good. I strongly feel you must deliver perfection and creativity through design in order to make something great.

We want the smartest minds to join us, but being the smart person isn't good enough. You have to possess humanitarian principals, because being smart doesn't matter if you don't use it to help people. Here at iHug, we all love what we do, and we're doing some of the greatest work of our life. We love working together to make healthcare accessible to everyone, anywhere. That's what differentiates iHug from the masses, and sets our platform apart from anything that exists on this planet.

With Love,

A handwritten signature in black ink, appearing to read 'Adam John'. The signature is fluid and cursive, with a large initial 'A' and 'J'.

Adam John
*Founder, Chairman, and
Chief Executive Officer*

OUR REPUTATION STARTS AND ENDS WITH YOU



Abiding by the COBC — is not optional.



Act with integrity every day.



Avoid even the perception of a conflict of interest.



Treat each other with respect.



Speak up if something is not right



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THE CODE OF BUSINESS CONDUCT AT IHUG INC.

OUR CODE OF BUSINESS CONDUCT (COBC)

We each make important contributions to protecting our company and its reputation. Recognizing right from wrong, and understanding the ethical and legal implications of our choices, is fundamental to doing what is right at iHug, Inc. We are each responsible for applying the standards outlined in our COBC to our work, every day, no matter where we do business around the globe.

YOUR ROLE

Our COBC is your guide to working with integrity, helping you do what is right in every situation, every day, no matter where you work.

Our company has been built on integrity, quality, and trust — with each other, our customers, and business partners. Our reputation starts and ends with each of us.

We are each responsible for understanding and following our COBC and other iHug Inc. policies, as well as the laws in each country where we do business. And it is just as important that we speak up if we see or suspect COBC violations.

MANAGERS HAVE AN EVEN MORE IMPORTANT ROLE:

- Lead and act with integrity
- Periodically review the COBC with your team
- Encourage employees to raise questions and concerns
- Ensure your team completes all required compliance training
- Openly support Zero Tolerance for Retaliation and Harassment
- Take prompt and effective action where appropriate
- Seek help from Global Integrity at global_integrity@ihughealth.com when needed

When in doubt, ask!

The COBC cannot provide specific advice for every situation. But, most problems can be avoided by referring to the COBC and asking for help when in doubt.

ASK YOURSELF

If you are not sure if something raises an ethical concern, ask yourself:

- Is this the right thing to do?
- Is this legal?
- Am I authorized to do this?
- Is it consistent with our COBC and other policies?
- Is this in line with iHug Inc.'s reputation or my personal reputation?
- Would I want to see this reported in the media?

SPEAK UP!

SHARE ANY CONCERNS

We are each responsible for living up to our COBC and acting with integrity. We have an equal responsibility to speak up and voice any questions and concerns.

If you believe anyone is not living up to our COBC, other policies or the law, have a question or concern, or are you unsure how to handle a situation, here is what you can do:

- Use our Open Door process and talk with your supervisor, manager, or Human Resources.
- If you are not comfortable using the Open Door process, email Global Integrity at global_integrity@ihughealth.com or contact the COBC internal team.

ZERO TOLERANCE FOR RETALIATION

We do not tolerate retaliation against any employee who reports in good faith a suspected violation of the COBC, our policies or the law, or who participates in any investigation of a suspected violation. Managers are prohibited from taking an adverse employment action against an employee for raising a COBC or legal concern. Prohibited retaliation includes, but is not limited to, demotion, pay increase, termination, reassignment or failure to promote. If you feel you have been subject to retaliation or you believe you have seen it in the workplace, please report it promptly to your manager, Human Resources, or the COBC internal team. Every complaint will be fairly, promptly and thoroughly investigated, and we will take appropriate action, up to and including termination, to prevent violations of this policy.

ZERO TOLERANCE FOR HARASSMENT

iHug Inc. does not tolerate unlawful harassment or any mistreatment by or of employees (including individual contributors, managers, and contingent workers), guests, clients, or agency partners in the workplace or in a work-related situation on the basis of sex, race, color, nationality, ethnic or national origin, ancestry, citizenship, religion (or belief, where applicable), age, physical or mental disability, medical condition, sexual orientation, veteran status, marital status, genetic information or characteristics (or those of a family member), or any other category protected under applicable federal, state, or local law. If you suspect harassment, discrimination, or retaliation (as described in our Harassment Policy) has occurred, you are encouraged, and managers are required, to promptly provide a written or oral complaint to our internal COBC team or email global_integrity@ihughealth.com.

YOUR WORK ENVIRONMENT

At iHug Inc., we want to do more than just follow the law. Working with integrity and treating each other with respect is the foundation of an environment that inspires creativity and delivers results.

ZERO MEANS ZERO: NO DISCRIMINATION OR HARASSMENT

We are committed to providing employees a workplace where they feel respected and appreciated. We have zero tolerance for discrimination, harassment, or retaliation. All employment decisions, including but not limited to hiring, training, advancement, compensation, scheduling, discipline and termination are to be made without regard to race, ethnicity, color, age, gender, gender identity, gender expression, sexual orientation, religion, creed, marital status, pregnancy, genetic information, medical condition, nursing mother status, national origin/ancestry, citizenship, physical/mental disability, military or veteran status or any other basis prohibited by law or iHug, Inc. policy (“protected status”).

Harassment is unwelcome conduct that creates an intimidating, hostile, or offensive environment, based upon another’s protected status. Any such unwanted and/or unwelcome behavior — whether it is physical, verbal, in person, written, or through email, text messages, social media, or other means — is prohibited. Examples include but are not limited to: use of epithets, slurs, or derogatory terms, insults, jokes, offensive remarks, teasing and other verbal, non-verbal, graphic, electronic, or physical conduct.

In addition to the above, “sexual harassment” can include:

- Unwanted sexual advances or propositions
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Visual conduct: Leering, making sexual gestures, displaying of sexual suggestive objects or pictures, cartoons or posters, electronic display or dissemination of such material
- Verbal Conduct: Making or using derogatory comments, epithets, slurs and jokes
- Verbal abuse of a sexual nature, graphic verbal commentaries about a person’s body, sexually degrading words used to describe a person, suggestive or obscene letters, notes or invitations
- Physical conduct: Touching, assault, impeding or blocking movements

HOW TO REPORT A CONCERN

We cannot help resolve a discrimination or harassment problem unless we know about it. It is everyone’s responsibility to share their concerns so the appropriate steps can be taken to resolve the issue. If you feel you have been subject to discrimination or harassment or you have seen it in the workplace, please report it promptly to your manager, Human Resources, Global Integrity or the COBC internal team. Every complaint will be fairly, promptly, and thoroughly investigated. A reported concern will be kept confidential to the extent possible, and disclosure of information will be limited to persons only on a “need to know” basis. All employees are expected to fully cooperate with investigations related to Zero Means Zero Policy violations. Failure to cooperate may result in discipline, including termination. If any employee is found to have violated the Zero Means Zero Policy, we will take appropriate corrective action, which may include termination.

HEALTH AND SAFETY

We are committed to providing a safe and healthy working environment for employees, customers, contractors and vendors.

ZERO TOLERANCE FOR WORKPLACE VIOLENCE:

iHug Inc. has zero tolerance for workplace violence. Any act of threat of physical violence, including intimidation, harassment, and/or coercion by any employee or non-employee that involve or affect our employees, the Company, or Company property will not be tolerated and are expected to be reported immediately. Acts of threats of violence include conduct is determined to be sufficiently severe, offensive, or intimidating, such that it creates abusive or hostile work environment for one or more employees.

DRUGS AND ALCOHOL POLICY:

You may not use, sell, possess, purchase or transfer illegal drugs — or sell, transfer or distribute personal prescription drugs — on iHug Inc. premises, in company vehicles or during work hours. You also may not be under the influence of any substance during work hours that impairs your ability to work safely or that creates a risk to your own safety, the safety of others, or company property.

You are not permitted to drink, or be under the influence of, alcohol during work hours or on iHug Inc. premises with one exceptions: If you are of legal drinking age, you may drink alcohol at company-sponsored functions that are approved by a Senior Vice President or above.

VENDOR SAFETY GUIDELINES:

It is important that our vendors also follow applicable health and safety regulations. Merchandise vendors must also follow the guidelines outlined in iHug Inc.'s Code of Vendor Conduct.

RECORDING YOUR TIME

If you are a non-exempt (hourly) employee, you must accurately record your time worked as required by law or policy in your country — whether scheduled or unscheduled, overtime or straight time, authorized or unauthorized. You should let your supervisor or manager know if you are having any problems recording your time.

RECORDING YOUR TIME ACCURATELY

When recording your time, remember that non-exempt (hourly) employees should never:

- Work without pay, including not recording hours for work done remotely
- Fail to report overtime, whether approved or unapproved, including by moving hours from one day to another on a time record so as not to reflect overtime
- Record time for a co-worker or ask a co-worker to record time for you
- Inaccurately record time worked
- Remove correctly recorded hours from a time record

OTHER WORK STANDARDS

iHug, Inc. employees are required to follow all applicable laws and regulations regarding meal periods, rest breaks and employment of minors. If you see or suspect any violation of these standards, please talk with your manager or your Human Resources representative.

RECORDING COMMISSION SALES

If you are a commission only independent contractor working on a 1099, you must accurately track all sales and earnings according to local and federal laws, and our policy in your country — whether you closed a sale contract with a new client or did not close the sale, all sales activity should be tracked and measured so that iHug Inc. complies with our financial disclosure, systems and internal/external audits as well as accurately disbursing payments to you.

INDEPENDENT CONTRACTORS

iHug Inc. complies with all local, and federal employment laws when hiring an independent contractors in an effort to create jobs, provide financial prosperity, and strengthen our world economy through individual empowerment.

- We never instruct independent contractors to perform their job or role.
- We never train independent contractors as they already have experience in their role
- We never set work schedules from breaks, lunches to overtime
- We never require independent contractors to physically be on iHug Inc. premises
- We never pay independent contractors hourly, weekly, monthly. We only pay based on each contract completed
- All independent contractors provide their own mobile devices, laptops, PC's etc. to perform their role and fulfill their contract
- We never require independent contractors to follow orders or a sequence of processes to perform their job. Independent contracts can operate at will so as long as they complete each contract
- All independent contactors perform their job to service multiple customers and the general public. They do so on their own free will through their advertisement, networking, business cards, and other ways to complete each contract
- All independent contractors have a right to quit after all contracts are fulfilled

CONFLICTS OF INTEREST

A conflict of interest is when your personal interest or involvement in a situation interferes with your ability to make decisions objectively and act in the best interest of iHug Inc. It is important that we avoid activities that create — or even appear to create — a conflict of interest with the company. Even when nothing wrong is intended, the appearance of conflicting interests can hurt your reputation and the company's image.

Avoiding potential conflicts of interest also means that you should not use iHug Inc.'s products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you have an unfair advantage over anyone outside of iHug Inc. For example, you should never approve iHug Inc. accounts, services, or credits for yourself, your friends, family members or any person(s), companies, entity(ies), State and Government officials.

Similarly, you should not use the tools, information, or access that you have as an employee, independent contractor, business partner and others to participate in or to generate a financial benefit for yourself or others from misuse of iHug Inc. confidential information, corporate secrets, internal information, intellectual property, notes, videos, data on machines, products, and services that benefit you, your friends, family, business partners, acquaintances and others financially, through gifts, corporate perks, and other types of gains and experiences using iHug Inc.

If you see or suspect a conflict of interest, talk with your manager or your Human Resources representative, email support@ihugsoftwares.com

SITUATIONS YOU MUST AVOID:

- Giving, receiving or soliciting tips, gifts, entertainment, discounts or other personal benefits outside of policy
- Directing business to third parties when you know they are owned or managed by your family members or close personal friends
- Misusing company resources, your position or influence to promote or assist an outside activity, including a second job using business relationships to further a personal interest, including support for charitable organizations
- Holding a significant financial interest in a supplier, competitor or vendor of the company with prior authorization from our Chief Compliance Officer

MAKE SURE YOU ASK YOURSELF:

If you are not sure if you face a conflict of interest situation, review this checklist:

- Will the activity influence my business decision?
- Will a family member or friend benefit personally from my involvement in this situation?
If this situation becomes public knowledge, would the company be embarrassed?
- Will my participation in this activity interfere with my ability to do my job?
- Would anyone think it might affect how I do my job?

GIVING OR ACCEPTING GIFTS AND ENTERTAINMENT

It is important to avoid even the appearance of making inappropriate or unethical business decisions. To prevent this situation, we discourage you and your family members from giving, soliciting or receiving gifts and entertainment from anyone doing business with (or wishing to do business with) iHug, Inc. Gift examples include cash, or cash equivalents, (including gift cards of any dollar amount), samples, discounts, event tickets, personal favors, recreation and transportation. Entertainment could include tickets to sporting events, concerts, golf and other events you attend or participate in with the outside individual.

The following types of gifts and entertainment are absolutely prohibited:

- Gifts exceeding \$50 USD (or equivalent)
- Entertainment exceeding \$100 USD (or equivalent)
- Any solicited gift
- Gifts exchanged in the form of cash or cash equivalents
- Entertainment that would violate other provisions of the COBC

If business circumstances call for the exchange of gifts or entertainment, use good judgement to make sure the exchange does not influence — or appear to influence — your business decisions. Remember: If you give a gift or entertainment to someone you work with outside the company, it needs to support a legitimate iHug, Inc. business interest.

You are required to notify Global Integrity at global_integrity@ihughealth.com about all gifts or entertainment received in any one-year period if:

- The gift and entertainment total more than \$100 USD (or equivalent) from a single source
- The gift and entertainment total more than \$250 USD (or equivalent) from all sources combined.

Some iHug Inc. departments may have more restrictive rules about giving and receiving gifts, so make sure you understand your department's policies before accepting or giving any gifts.

ASK YOURSELF

Regardless of value, before giving or accepting any gift or entertainment always consider:

- Is the exchange intended to influence business negotiations?
- Will the exchange appear to others to influence business negotiations?
- Will the exchange result in any special or favored treatment?
- Will my participation in the activity reflect poorly on iHug, Inc.?
- Is this in line with iHug Inc.'s reputation or my personal reputation?

If your answer is YES to any of the above, do not participate in the exchange.

A few exceptions when it comes to gifts:

Business meals:

As long as they are infrequent and not extravagant, business meals are not considered gifts or entertainment, and may be accepted. However, it is critical that any business meal does not create a sense of obligation or result in favored treatment with a vendor or business partner.

Non-cash holiday gifts:

As long as you share them with your department, you are allowed to accept holiday gift items such as gift baskets, cookies, chocolates, flowers, moon cakes, Ochugen and Oseibo gifts, or other such non-cash gifts, even if they exceed the \$50 USD (or equivalent) gift limit.

Third-party trainings:

Some conference or training by third parties may also be accepted with prior approval from the Global integrity department.

HIRING FRIENDS AND FAMILY:

Even if you are extremely careful, working directly with your spouse, partner, relative or friend can create an actual or perceived conflict of interest. You must get the written approval of the Chief Compliance Officer and your Vice President or above before doing company business with relatives, friends, spouses or life partners. Of course, under no circumstance may you pressure others into hiring your relatives, friends, spouses or life partners as a company employee, supplier, vendor or landlord.

MAKE SURE TO ASK YOURSELF

If working with a family member or friend, or if a family member or friend is seeking to do business with iHug Inc., consider:

- Does, or would one of you, supervise or report to the other?
- Does, or would either of you, provide input on the other's performance or career?
- Are you involved in the hiring or bid process involving this person?

If you answered YES to any of these questions, you should talk to your manager or Human Resources representative.

HANDLING PERSONAL RELATIONSHIPS AT WORK

We recognize and respect your rights to socialize and pursue personal relationships with your co-workers. You should use good judgement to make sure these relationships don't negatively impact your job performance, ability to supervise others or work environment.

Employees who find themselves in an intimate relationship or friendship should use tact and sensitivity to make sure they are not creating an uncomfortable work environment for others. Favoritism, open displays of affection, and business decisions based on emotions or friendships — rather than on the best interests of the company — are examples of inappropriate conduct.

Personnel decisions can become difficult if you supervise someone you are romantically involved with, living with or related to — leading to a possible real or perceived conflict of interest. If you are related to, dating, living with, or romantically involved with someone in your reporting line, you must inform your manager or Human Resources representative immediately. For purposes of this policy, a reporting line exists where you have control or influence over another employee's conditions of employment (i.e. salary, hours worked, shifts, etc.) whether or not there is a direct reporting relationship. For example, if you supervise the supervise of the employee you are related to, dating, living with, or romantically involved with, that would be considered in your reporting line.

Or, if you can influence the work hours or schedule of the employee you are related to, dating, living with, or romantically involved with, that would be considered in your reporting line even if the employee reports to someone other than you.

This policy applies not only to existing relationships, but also where an organizational change or store move puts you in the same reporting line as defined above or in a position of influence.

WORKING OUTSIDE OF IHUG INC.

You are required to get the approval of your supervisor and Human Resources before accepting another job or working outside of iHug Inc. You also need written approval from the Chief Compliance Officer before working for any iHug suppliers, vendor, competitor or landlord.

Always remember that you may not use any company resources (time, equipment, staff, facilities, etc.) to support any outside work.

BOARD SERVICE

For profit organizations:

You need the approval of the Chief Executive Officer and Chief Compliance Officer before serving as the director or officer of any other for-profit company. And note, you may not serve as the director or officer of a iHug Inc. competitor, potential competitor or a company with a significant line of products that compete with those offered by iHug Inc.

Non-profit organizations:

We encourage you to serve as the director, trustee or officer of a non-profit organization on your own time. However, if you are representing iHug Inc., you must inform the Chief Compliance Officer. If you serve as a director or officer of a non-profit organization on your own time, always remember that you may not use company resources to support any activity of the non-profit organization.

OUR GLOBAL BUSINESS

Our COBC reflects our commitment to deliver results with integrity and work to the highest ethics and compliance standards. Putting our COBC into practice means taking responsibility for our actions and creating with quality, every time.

PRODUCT INTEGRITY

We take pride in providing the highest quality products possible. In addition to meeting our own internal quality standards, our products must be produced, tested, packaged and labeled in full compliance with applicable laws.

Local Laws and Local Business Practices:

- If a local law conflicts with our COBC, you should follow the law
- If a local business practice conflicts with our COBC, you should follow the COBC

If you have a question about what is the right thing to do, contact Global Integrity at global_integrity@ihugsoftwares.com.

INTERNAL TRADE REGULATIONS:

If you are involved with importing or exporting goods among various countries, you are required to understand and follow relevant legal requirements. If you have questions about import/export requirements or other international trade issues, please contact the Legal departments to avoid potentially breaking the law (see Resources on page 20 for contact information).

DOING WHAT IS RIGHT WHEREVER WE WORK: APPLICABLE LAWS

We realize there are differences in local laws and practices in different countries.

Sometimes our COBC may go above and beyond what is required by law. Because we are committed to meeting the highest standards of business conduct wherever we do business, we all must follow all aspects of the COBC, even if it is not required by local laws.

There may be country-specific laws that are not addressed by our COBC, but are included in other iHug Inc. policy manuals. Make sure you know and follow all laws and policies that relate to your job.

There is ever a question that we follow the laws of the countries where we do business. Not following the law may result in corrective action (including termination), recovery of damages and criminal charges.

ANTI-BOYCOTT POLICY

By law, iHug, Inc. employees and agents may not support or cooperate with an unsanctioned boycott of another country that is friendly to the United States. The company must report any information about, or request to support, a boycott to the U.S. government. You could receive this type of request in a bid invitation, purchase contract, letter of credit or verbally. If you learn of a boycott of another country that is “friendly” to the United States, contact the Legal department (see Resources on page 20 for the contract information).

BRIBES AND IMPROPER PAYMENT (ANTI-CORRUPTION)

Giving bribes, kickbacks or either improper cash payments (or anything else of value) to Government officials, civil servants or anyone else to influence decisions and/or services by the government is prohibited and illegal under the U.S. Foreign Corrupt Practices Act (FCPA) and similar international anti-bribery laws. This includes direct or indirect offers or promises of payment. Even if bribery seems to be an accepted local practice in a country, it is against the law and iHug, Inc. employees are prohibited to engage in this practice. As a company who sets the highest standards in business, we abide by all laws including strictly complying with the Company’s Anti-Corruption policies and related procedures, such as the Anti-Corruption Due Diligence process, and the FCPA and local anti-bribery laws. Failure to comply can result in corporate fines, legal action and imprisonment of individuals, as well as harm to our company reputation.

iHug Inc. strictly prohibits any payment made for convenience or to facilitate or expedite performance of routine government functions, except for services where a government issued receipt is provided. For example, you cannot pay to avoid a two hour wait in line for a government service or approval. If you become aware of a potential violation of any anti-bribery law, including making a facilitation payment, contact Global Integrity at global_integrity@ihughealth.com immediately. Likewise, contact Global Integrity if a government official ever solicits or requests a bribe or kickback.

ASK YOURSELF

Are any of these red flags present?

- Doing business in a country that has a reputation for corruption
- Unreasonably high fees are being requested
- Unusual payment methods, such as requests for payments in cash
- Lack of transparency in expense or accounting records
- Deliverables that sound too good to be true

COMPETITION LAWS (ANTI-TRUST)

Many of the countries where we do business have competition laws, or “anti-trust” laws. These laws reinforce our own standards - it is not business at any cost, and everyone needs to be able to compete fairly in a free market. These laws generally prohibit business practices that interfere with competition, including price fixing, or allocation of either markets or vendors.

iHug Inc. employees and directors are required to comply with our Competition Law Policy and local laws. Any employees who violates this policy may be subject to disciplinary action, including termination, significant monetary damages or fines, and even imprisonment. Additionally, iHug Inc. can be prosecuted and fined millions of dollars, may have to pay damages and attorneys’ fees, and could lose shareholder confidence and public trust as a result of competition law violations. Read the full policy at ihugfamily.com

If you have any concern about a violation of competition laws by the company, an employee or competition, contact the Legal department (see Resources of page 20).

MAKE SURE TO:

- Review iHug Inc.’s Competition Law Policy for more details on these laws and examples of prohibited activities
- Consult with iHug Inc.’s Legal department before beginning any discussions or attending any meetings with competitors
- Use caution in all activities and discussions at trade associations, trade shows and similar joint endeavors that involve competitors
- Contact iHug Inc.’s Legal department to report any activity by employees or competitors that you believe may be inappropriate

MAKE SURE TO:

- Talk to a competitor about prices, marketing practices, other competitors, vendors, market allocation, or geographic regions
- Try to influence the prices at which franchisees or other third-parties resell our products
- Make any statements or written records, even in jest, that suggest that a proposed course of action will eliminate competition (e.g., “our plan will crush competition” or “this acquisition would eliminate a competitor”)

FAIR AND HONEST IN OUR BUSINESS DEALINGS

Doing what is right and acting with integrity has always been a fundamental part of our culture. Our employees, customers, and business partners know they can trust iHug Inc. to be fair and honest. This trust is critical. You should always deal fairly with our customers, suppliers, vendors, competitors and fellow employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, falsification, misrepresentation of material facts or any other intentional unfair dealing practice.

If you have any concern about a violation of competition laws by the company, an employee or competition, contact the Legal department (see Resources of page 20).

INTELLECTUAL PROPERTY RIGHTS

As we expect others to recognize the legal rights we have in our brands and designs, we respect the legal rights of others. You should never make unauthorized copies of material from books, magazines, newspapers, films, videotapes, music recordings, websites, products or computer programs. If you have questions about what materials you can or cannot use, email the Legal departments legal@ihughealth.com

GOVERNMENT AGENCY COMPLAINTS

Occasionally, an applicant, customer, or current/former employee may file — or threaten to file — a complaint against iHug, Inc. with the Government. If you are contacted about a government complaint, immediately contact our internal COBC team. Neither your supervisor nor the company are permitted to take any action against you for making or reporting a government complaint.

GOVERNMENT REQUESTS FOR INFORMATION

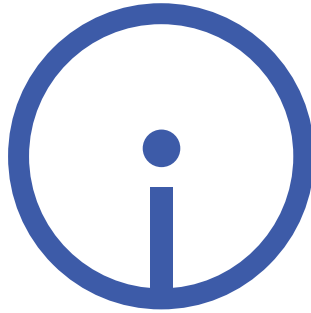
We will always cooperate appropriately with the proper government requests or investigation. If you are asked by a government official to provide company information (either written or verbally) for government investigation — or if a government representative visits your workplace asking for company records, documents or other information — notify the Human Resources department or Legal department (see resources on page 20 or read the Government Response Plan or iHugWeb). You should always give truthful, accurate information, and never try to obstruct, influence or impede the request for information. You also should not alter, falsify, mutilate, cover up, dispose of or destroy any documents or records related to a government request, investigation or legal proceeding.

PROTECTING OUR ENVIRONMENT

iHug, Inc. is committed to minimizing the negative impact of our business activities on the environment from implementing our intellectual property to building strategic business partnerships to collaborate on sustainability solutions.

Our partnerships with companies, nonprofits, and coalitions are helping to drive access to electric mobility, and catalyze climate action across the globe. We believe sustainability is about more than operating responsibly. It's an opportunity to support the communities we're a part of and make a positive impact on the world.

That's why we're working to minimize our energy consumption from server farms, emissions and water impact, protect employees and the environment through partnerships with others to develop and share solutions for a more sustainable world beyond our operations. One major step in the right direction is driving electric solar power, electric transportation vehicles, and battery power packs through various partners to reduce our emissions footprint and reduce climate change.



OPEN LETTER ON PRIVACY OF INFORMATION

Privacy has always been a hot topic of discussion during large forums and collectively throughout the world. iHug strongly believes in deep privacy protocol. In today's ever growing world of technology and the cloud, it's vitally important large corporations take an active role in promoting, developing and investing in privacy.

We also believe these same corporations should not only advocate for the deepest level of privacy protocol, they should also demonstrate privacy through their own internal operations. It's critically important that every entity, set privacy protocols with the highest level of transparency. They must discuss, disclose and educate people on how, when and where they will use someone's information.

iHug understands that technology can genuinely enrich someone's life, and the more information the user provides, the more we learn about the user. It is with that information we can tailor our products and services to the individual user. By having access to such information, we can proactively fulfill a demand while simultaneously offer more value to the iHug community.

iHug's core belief in privacy is very simple. Every time a user submits a request, which contains personal identifiable information and GPS location. We will repeatedly ask for permission, in simple and easy to understand terms. We will also disclose how, when and where their information is being deployed within the iHug App. I hope this sets the bar for the future of iHug. We also have a privacy guarantee page you can visit at <http://ihugfamily.com/corporate/privacy>

Adam John
*Founder, Chairman, and
Chief Executive Officer*

PROTECTING INFORMATION AND OUR REPUTATION

We each have a responsibility to protect iHug Inc.'s assets, both intangible assets, which include our brands, reputation, confidential information, and personal information about our customers, employees, and others, and physical assets, such as merchandise, equipment, and computers.

SAFEGUARDING CONFIDENTIAL AND PERSONAL INFORMATION

From time to time, you may have access to, or the ability to access, non-public, confidential information about our company, such as unannounced product information or designs, business or strategic plans, financial information, organizational charts, and other materials.

You may also have access to personal information about co-workers, customers, consultants, vendors, or other individuals. Personal information is any information relating to an identified or identifiable individual, such as names, addresses, email addresses, telephone numbers, government identification numbers (such as Social Security numbers), employee ID numbers, and credit card or bank account information.

Personal information may include race, gender, age, sexual orientation, religion, medical condition, and similar information. It can also include computer and mobile device identifiers, customer transaction history, employment history, and demographic information.

We are each responsible for protecting and securing iHug Inc.'s confidential and personal information in accordance with our policies and applicable laws, both while we are employees and after our employment ends. Failure to do so may damage our relationships with employees, customers, and suppliers and our company reputation and could result in legal liability. Unauthorized use, disclosure or any action impacting the confidentiality of the information may lead to disciplinary action, including termination.

KEEPING IHUG INC.'S SYSTEM SECURE

You may have access to iHug Inc.'s systems and networks as part of your work, including email, shared drives, laptops, mobile devices, and software applications. We each have a responsibility to use company technology appropriately and to keep our systems secure from unauthorized access. Data breaches and cybersecurity incidents can happen in many ways, including the loss of a laptop, sharing passwords, connecting to an unfamiliar WiFi network, downloading malicious software, and other compromises of company systems and security measures.

MAKE SURE TO:

- Only share confidential and personal data in accordance with iHug, Inc. policies
- Share confidential or personal information only with co-workers who need to know the information to do their jobs
- Keep our laptop and other devices secure at all times
- Report any suspected inappropriate use or disclosure of confidential or personal information by contacting Corporate Security, using the Open Door process, or contacting the COBC internal team
- Report any suspected unauthorized access or breach of company systems or networks to iHug Inc.'s 24/7 Corporate Security Operations Center

AND DO NOT:

- Use confidential or personal information unless there is a legitimate business purpose
- Use confidential or personal information for your own benefit or the benefit of anyone else
- Share confidential or personal information with anyone outside the company without an appropriate agreement approved by the Legal department
- Discuss confidential or personal information in public, including on social media
- Share your passwords with anyone
- Click on links or files in an email if you are unsure whether it is genuine or connect your device to unknown networks

Personal information should only be collected, stored, transmitted, accessed, used, and shared in accordance with iHug Inc. policies and applicable laws. You must consult with the Privacy and Information Security teams before implementing any new processes or technologies that collect or use personal information.

We also need to protect the confidential and personal information of other companies. For example you should never take or use confidential or personal information from a previous employer. You also, should not ask for such information from another company's employees or suppliers.

MATERIAL INFORMATION AND INSIDER TRADING

You may become aware of important company information before it has been made available to the public. This information is called “material information” when it could influence a decision to buy or sell a company’s stock. Material information can include financial information (margins, earnings, sales, and inventory), significant proposed acquisitions or management changes, planned dividends or stock splits or anything else that could affect the stock price of iHug Inc. or another company.

ASK YOURSELF

In deciding whether something is material information, consider if the information makes you think of buying or selling the stock of iHug Inc. or another company. If the answer is YES, it would likely have the same effect on others and is probably material information.

Trading on material information before it has been made public, also called “insider trading,” is illegal and unethical, and can have severe consequences. The U.S. Securities and Exchange Commission and similar agencies are authorized to bring a civil lawsuit against anyone who trades on inside information (or who provides another person with inside information) and also against the company. Insider trading is also a crime subjects to criminal penalties, including jail terms.

You are not allowed to buy or sell the stock (or other securities) of iHug Inc. or another company when you are aware of material information that has not been made public. You are also not allowed to share that information with others (other than as required to do your job), or advise them to buy and sell the company’s stock until the information has been made public.

Once material information has been fully disclosed to the public, you may trade in the company’s stock. Adequate public disclosure requires that the information be widely disclosed (such as to the national wire services through a press release) and that a sufficient period of time elapse for the information to be effectively disseminated. While there are no formal rules around what is a sufficient period of time, this generally means at least one full trading day after the information was widely disclosed.

If you are unsure whether information is material or has been released to the public, contact the Global Equity Administration department before trading (see resources on page 20).

MEDIA INQUIRIES

Our Corporate Communications department handles medical inquiries for iHug Inc. Per our company media policy, employees may not speak to reporters on behalf of iHug Inc. unless authorized. If you talk directly to reporters without first going through Corporate Communications, you risk providing incorrect information, revealing proprietary strategies or damaging our company’s reputation.

Instead, direct all media inquiries to the Corporate Communications team (see Resources on page 20 for contact information).

FINANCIAL INTEGRITY

Accurate business records are essential to managing a successful company and required by law. Every employee is responsible for making sure all company records, information and accounts are clear, truthful and accurate. For example, your expense reports, time records, payments, and other transactions must be correctly recorded, accounted for and approved.

Whether we are a publicly traded company or not, it is critical that we are able to disclose and report company information, including our financial condition, in a full, fair, accurate, timely and understandable way. All employees must comply with company policies, procedures and controls. Accounting and financial reporting of transactions and forecasts must follow iHug Inc.'s accounting policies as well as all generally accepted accounting principles and laws.

If you have any concerns about the company's financial controls, accounting, financial reporting or auditing, contact global_integrity@ihughealth.com or the COBC internal team.

MANAGING COMPANY INFORMATION

iHug Inc. generates a large volume of electronic transactions and information every day. If there are any paper records, they must be managed in accordance with our Records Compliance Policy and retained for the time periods identified in the Records Retention Schedule prior to being destroyed. In the event you receive a hold notice from Legal or Tax for litigation, audit, or government investigation, applicable records will need to be held beyond their normal retention periods and must not be altered or destroyed until the hold has been rescinded. Also, records and artifacts of heritage value should be transferred to the Corporate Archive.

COOPERATING WITH AUDITS

We all must cooperate fully with our internal and external auditors. You must not take any action to coerce, manipulate, mislead or fraudulently influence any public accountant engaged in an audit or review of iHug Inc.'s financial statements.

COMPANY PROPERTY

iHug Inc., property (for example iMac's, iPad's, iPhone's, servers, and other tools) should be used only for business purposes and not for personal use. Taking or using company property of any value for personal purposes without permission is stealing. iHug Inc. property may never be used for illegal purposes. You are prohibited from doing anything that involves fraud, theft, embezzlement or misappropriation of company property. If you suspect that activities in our workspaces or workplaces are taking place and result in financial losses to the company (for example, stealing), talk with your manager or contact the internal COBC team.

PATENTS, TRADEMARKS AND COUNTERFEIT SOFTWARE

Founded on passion, invention and innovation, iHug owns extensive patents and world-class trademarks with the United States Patent and Trademark Office, and in other countries. All iHug technologies, patents and trademarks are fiercely protected by our very persistent legal team.

We rely on a combination of patent, trademark, copyright and trade secret laws in the U.S. and other jurisdictions as well as confidentiality procedures and contractual provisions to protect our proprietary technology and our brand.

We have a duty and a right to inform the market of our patent and trademark rights. As part of those efforts, below you will find our virtual markings. The iHug App is covered by one or more of the following patents and/or trademarks, in the U.S. and other countries.

We rely on a combination of patent, trademark, copyright and trade secret laws in the U.S. and other jurisdictions as well as confidentiality procedures and contractual provisions to protect our proprietary technology and our brand.

Our trademarks (such as iHug, Wearable Technology, Wheelchair Transportation, Medicare/Medicaid Transfer System, Proprietary App Language, iPrevent, Healthcare for Everyone, Anywhere, Do-It-Yourself Healthcare, All Age Care, Care Rides, and Real Healthcare) are among our company's most valuable assets.

As our company becomes better known worldwide, we could encounter increasing problems with software hackers "pirates" who attempt to download and decompile, decompress or other ways to reverse engineer our software and technology in an effort to monetize it by way of selling without our permission. Our partners, vendors, contractors and other parties who we do business with are also prohibited from tampering, reverse engineering, and selling our property without our consent.

You should promptly report any and all suspicious activity you see or feel is unauthorized use of iHug Inc.'s trademarks, patents, business methods, and processes to the Legal department at legal@ihughealth.com

INVENTION ASSIGNMENTS

Developing or helping to develop outside inventions that a) relate to iHug Inc.'s existing or reasonably anticipated products and services, b) relate to your position at iHug Inc., or c) are developed using iHug Inc. corporate resources may create conflicts of interest and be subject to the provisions of iHug Inc.'s Confidential Information and Invention Assignment Agreement and other employment and contractual agreements. If you have any questions about potential conflicts or intellectual property ownership involving an outside invention or other intellectual property, send an email to ip@ihughealth.com.

UNDERSTANDING POLITICAL GUIDELINES

At iHug we believe in changing the world. In order for the world to achieve positive change we should all educate and encourage each other. iHug Inc. wants people to have a voice on issues that matter to them so they can build the communities they want. We believe a free and open mind is essential to democracy. People should freely be able to connect and engage with their communities.

WHAT YOU SHOULD KNOW

We encourage employees and Directors to get involved with issues that are important to our business and community. However, political activity is carefully regulated by law, and there are strict guidelines and prohibitions against employees participating in political activity on behalf of iHug Inc. For that reason, all political activity on behalf of the company must be initiated or approved in advance by Government Affairs.

POLITICAL ACTIVITIES

Your personal political activities must be done on your own time, with your own resources. Out of respect for others, you must not promote any personal political views or beliefs (including by posting or distributing notices or other materials) on iHug Inc. premises. You also should not suggest that you speak for the company or that iHug Inc. supports your personal views.

LOBBYING

Lobbying is generally defined as contact with elected officials regarding legislative or regulatory issues impacting iHug Inc. Because we are required to follow strict reporting requirements around lobbying, the Government Affairs team must approve any lobbying activities on behalf of the company, including retaining an external lobbyist or lobbying firm.

RESOURCES AND CONTACTS

QUESTIONS ABOUT	CONTACT	CONTACT INFORMATION
Boycotts	Legal	legal@ihughealth.com
Bribes or Improper Payments	Global Integrity	global_integrity@ihughealth.com
Competition Laws	Legal	legal@ihughealth.com
Confidential Information and Privacy	Privacy	privacy@ihughealth.com
Conflicts of Interests (gifts, entertainment, working with friends and family)	Global Integrity	global_integrity@ihughealth.com
Corporate Archive	Corporate Archive	corporate_archive@ihughealth.com
Discrimination, Harassment or Retaliation	Your manager, human resources or Global Integrity	global_integrity@ihughealth.com
Government Requests for Information	Your manager, human resources or Legal	legal@ihughealth.com
Insider Trading or Material Information	Global Equity Administration	global_equity_administration@ihughealth.com
Intellectual Property	Legal	ip@ihughealth.com
International Trade Regulations	Legal	legal@ihughealth.com
Lost Stolen Laptops or Company Devices	Corporate Security	corporate_security@ihughealth.com
Media Inquiries	Corporate Communications	press@ihughealth.com
Phish Email	Information Security	reportphishing@ihughealth.com
Political Activities	Government Affairs	govaffairs@ihughealth.com
Records Management	Records Compliance	records_compliance@ihughealth.com
Trademark Violations	Legal	ip@ihughealth.com
Use of Third-party Materials	Legal	ip@ihughealth.com
Vendor Conduct	Global Sustainability	global_sustainability@ihughealth.com



OPEN LETTER TO STEVE JOBS

Steve Jobs was a role model to us all. He always wanted to enrich our lives by intersecting technology with humanist elements. He empowered us all to use our imagination, and to bring that imagination to life through technology. He revolutionized storytelling and encouraged us to laugh with happiness through Pixar. He gave us the iPod, so our souls could dance. He changed the world.

I worked at Apple during the time Steve had returned. He had redesigned the iMac, and was at the peak in his career. I wanted to be part of it. Steve inspired me to work for him. He believed in me, before I believed in myself. It was a time in my life I will forever hold close to my heart. Through his belief, I am re-imagining healthcare. I've architected the world first quadrilateral app.

With that being said, there was one particular core value that Steve instilled in Apple. It was the fundamental belief that, "people with passion can change the world." He was right, he was one of those people, and I've learned since, so am I. He transformed the entire direction of the world. He devoted his life to people, their happiness and gave us all better lives through technology.

I am honored to say that it was that belief, that gave life to iHug. We will forever be grateful. As part of our dedication to Steve, we've chosen the Apple App Store to be our primary platform for our iOS apps.

We are very proud, and we owe it all to Steve Jobs, thank you Steve.

With Love,

Adam John
*Founder, Chairman, and
Chief Executive Officer*





We believe there's work, and
there's your **Life's Work.**

We want you to do some of the
Greatest Work of your **Life.**