

NEXTGEN HEALTHCARE
VENDOR CODE OF CONDUCT

Principles and standards for conducting business with NextGen Healthcare

Corporate integrity, responsible practices, and the safety and wellbeing of workers across the global value chain are of paramount importance to NextGen Healthcare. These principles apply to all aspects of our business and encompass all suppliers, contractors, vendors and other third parties, including, without limitation, the agents, affiliates and subcontractors of such entities and individuals (each a “Supplier” and collectively “Suppliers”) that provide products or services to, on behalf of or for the benefit of NextGen Healthcare and/or its clients. To the fullest extent permitted by law, we expect our suppliers to share these commitments and adhere to the principles set forth herein.

Compliance with Laws

Suppliers shall abide by all national and international laws and norms applicable in the jurisdictions in which they operate, including those on anti-corruption, anti-money laundering and the prevention of financial crime, competition, environmental, labor & human rights, health and safety, and data protection.

Anti-Bribery/Anti-Corruption

Suppliers shall not engage in bribery, corruption, extortion, or embezzlement in any form. Suppliers must comply with all applicable anti-corruption laws or regulations, specifically, as applicable, the standards expected by the Bribery Act 2010 (United Kingdom) and the Foreign Corrupt Practices Act (United States) even if they provide goods and/or services outside the UK or the US. In addition, Suppliers should comply with all local statutes and regulations relating to anti-bribery and anti-corruption and have processes in place to ensure compliance. Suppliers shall not offer or accept bribes, kickbacks or participate in other illegal inducements in business or government relationships.

Fair Competition, Anti-Trust Laws, and Conflict of Interest

Suppliers shall uphold fair business standards in sales and advertising. Suppliers must conduct business in compliance with applicable fair-competition and anti-trust laws. Antitrust or competition vary from country to country, but generally such laws prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition without providing beneficial effects to consumers, including without limitation, unlawful boycotts, price fixing, market or customer allocation, marketing sharing or bid rigging.

Respect for Human Rights

Supplier shall uphold the principles of the Universal Declaration of Human Rights (UDHR) for its workers and its own suppliers. The UDHR supports, among others, the following principles: preservation of freedom, protection of equality, non-discrimination, eradication of slavery and torture, equality before the law, no unfair detainment, right to a trial, presumption of innocence, right to privacy, freedom of movement, and the right to belong to a country.

No Discrimination, Abuse, or Harassment

Suppliers shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.

Supplier shall treat workers with respect and dignity. Supplier shall not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Supplier must not condone or tolerate such behavior by its partners.

Overall Labor Principles

Suppliers should have working conditions that meet the standards of the International Labor Organization (ILO) and international human rights, which include but are not limited to the UDHR.

Child Labor Avoidance

Suppliers will uphold the ILO Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labor. Suppliers will ensure that no underage labor has been used in the production or distribution of goods and/or services. We do support the use of legitimate student, workplace apprentice or internship programs, in compliance with all applicable laws and regulations.

Wages, Benefits and Working Hours

Suppliers shall pay workers at least the minimum wage required by applicable laws or regulations and provide all mandated benefits. Suppliers shall pay workers in a timely manner and clearly convey the basis on which workers are paid. Suppliers will ensure working hours comply with national laws and standards and should not expect workers to work more than the statutory hours set out in relevant working time legislation or other national legal limits.

Freedom of Association and Collective Bargaining

Suppliers shall respect, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining, as permitted by law.

Health and Safety

NextGen Healthcare is committed to providing a safe work environment and promoting the health and well-being of our associates. Supplier will likewise create and maintain a safe work environment that promotes the health and safety of its personnel. Supplier shall protect workers from physical hazards and provide appropriate controls and procedures to mitigate health and safety risks.

Environment

NextGen Healthcare prefers to work with Suppliers that share its commitment to environmental sustainability. NextGen Healthcare encourages Suppliers to operate in an environmentally responsible manner and to commit to reducing the environmental impact of their operations, including by implementing appropriate conservation measures and waste and risk management systems.

Suppliers shall operate in compliance with all environmental laws relating to waste disposal, emissions, discharges, and hazardous and toxic material handling. Supplier shall act in accordance with applicable statutory and international standards, laws, and guidelines. Suppliers shall obtain and maintain all required environmental permits, licenses, and registrations and follow all required reporting and operational requirements of such permits.

Securities and Insider Trading

Suppliers will, and will cause its employees, agents, and contractors to, comply with applicable securities laws prohibiting trading in NextGen Healthcare securities based on material non-public information obtained by virtue of his or her position or relationship with NextGen Healthcare, and NextGen Healthcare's Insider Trading Policy (available upon request).

Conflicts of Interest

Suppliers are expected to adhere to all professional standards and codes governing conflicts of interest related to the goods provided or services performed.

Personal Data and Privacy

Many countries have laws and directives that regulate the processing or exchange of personal information or personal data relating to individuals. Suppliers will abide by the privacy and data protection laws, including those applicable to data controllers and processors, that are in effect in countries in which Supplier conducts business with respect to NextGen Healthcare. Supplier is responsible for protecting personal information as required by applicable law and will ensure that the information is not disclosed in violation of applicable laws, rules, regulations, or contractual obligations. Suppliers processing personal data on behalf of NextGen Healthcare or a NextGen Healthcare client, shall not process such data except on instructions from NextGen Healthcare. Suppliers will also support NextGen Healthcare's compliance with applicable laws relating to privacy and protection of personal data, including applicable data breach notification laws, and will provide notification to NextGen Healthcare in accordance with such laws.

Modern Slavery and Human Trafficking

All labor must be voluntary. Supplier shall not support or engage in slavery or human tracking in any part of its supply chain. Without limiting Supplier's obligations hereunder, Supplier shall not, and shall ensure that its partners do not, support or engage in, or require any: compelled, involuntary, or forced slave, bonded, child, illegal or compulsory labor. Where the Modern Slavery Act (2015) (MSA) (United Kingdom) is applicable, Suppliers will comply with the requirements contained therein. Suppliers will be immediately responsive to any requests from NextGen Healthcare to verify their compliance with the obligations of the MSA.

Report Violations

Please report any violations of the Supplier Code to a NextGen Healthcare team member or visit our confidential compliance reporting system:

https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=19599).