



GUARDIAN PHARMACY SERVICES, INC.

CODE OF BUSINESS CONDUCT AND ETHICS FOR EXECUTIVE OFFICERS AND MEMBERS OF THE BOARD OF DIRECTORS

Introduction

The Board of Directors (the “**Board**”) of Guardian Pharmacy Services, Inc. (the “**Company**”) has adopted this Code of Business Conduct and Ethics for its executive officers and members of the Board of Directors of the Company (this “**Code**”). This Code is intended to focus each executive officer and director on areas of ethical risk, provide guidance to help them recognize and deal with ethical issues, provide mechanisms to report unethical conduct, and help foster a culture of honesty and accountability. Each executive officer and director should carefully review, be familiar with and follow this Code.

No code or policy can anticipate every situation that may arise. This Code is intended to provide a broad overview of basic ethical principles that guide our conduct. In some circumstances, we maintain more specific policies on the topics referred to in this Code. Should you have any questions regarding these policies, please contact the General Counsel & Senior Compliance Officer.

All executive officers of the Company are also covered by, and are expected to comply with, the Company’s Code of Conduct & Business Ethics (the “**Company Code of Conduct**”).

Compliance with Laws, Rules and Regulations

We strive to comply with all laws, rules, and regulations of the places where we do business. It is the personal responsibility of each executive officer and director to adhere to the standards and restrictions imposed by those laws, rules and regulations. If a law, rule or regulation is unclear, or conflicts with a provision of this Code, you should seek advice from the General Counsel & Senior Compliance Officer but always seek to act in accordance with the ethical standards described in this Code.

Our commitment to complying with the laws, rules, and regulations applicable to us and to fair and ethical business practices requires that our executive officers and directors carefully avoid even the appearance of giving, offering, authorizing or taking bribes of any form. This includes confirming that all gifts given or received in connection with an executive officer’s or director’s position at the Company conform to the Company’s gift policies outlined in this Code and, with respect to officers, the Company Code of Conduct.

Conflicts of Interest

We conduct our business affairs in the best interests of the Company and should therefore avoid situations where our private interests may interfere in any way with the Company's interests. Any situation that involves, or may reasonably be expected to involve, a conflict of interest between an executive officer and the Company should be disclosed promptly to the General Counsel & Senior Compliance Officer. Any situation that involves, or may reasonably be expected to involve, a conflict of interest between a director and the Company should be disclosed promptly to the Chairman of the Board.

A "conflict of interest" can occur when an executive officer's or a director's personal interest interferes in any way with — or may appear to interfere in any way with — the interests of the Company as a whole. Personal interests may include commercial, industrial, banking, consulting, legal, accounting, charitable and financial relationships, among others. Conflicts of interest may also arise when a director, executive officer or a member of his or her family receives personal benefits outside of the compensation or reimbursement programs approved by the Board. Such impermissible personal benefits include loans by the Company to, or guarantees by the Company of obligations of, directors or executive officers or their family members.

Public Reporting, Record-Keeping and Senior Financial Officers

We are a public company and as a result file reports and other documents with the Securities and Exchange Commission ("SEC") and the New York Stock Exchange ("NYSE"), the exchange on which our securities trade. We also issue press releases and make other public communications that include financial and other information about our business, financial condition and results of operations. We endeavor to make full, fair, accurate, timely and understandable disclosure in reports and other documents we file with, or submit to, the SEC and the NYSE and in our press releases and other public communications.

All of our books, records, accounts, and financial statements are maintained in reasonable detail, appropriate reflect our transactions, and conform both to applicable legal requirements and to our system of internal controls. We maintain our records according to our record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, please consult the General Counsel & Senior Compliance Officer.

The CEO, Chief Financial Officer and the Controller (collectively, the "**Senior Financial Officers**"), among others, have a supervisory role over the preparation of the disclosure in the reports and other documents required to be filed by the Company. Adequate supervision includes properly reviewing and approving proposed disclosure for accuracy and completeness. The Senior Financial Officers are required to familiarize themselves with the disclosure requirements applicable to the Company as well as the business and financial operations of the Company and are prohibited from knowingly misrepresenting, or causing others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company's independent auditors. However, while the Senior Financial Officers have the additional responsibilities discussed above, each executive officer and director has an individual duty, to the extent that he or she has knowledge or control over such items, to ensure that the Company's books, records, accounts, and any other information that is disclosed in the reports and other documents filed by the Company are accurately maintained and represented.

Insider Trading

We do not trade in Company securities on the basis of material, non-public information concerning the Company, nor do we “tip” others who may trade in Company securities. Executive officers and directors are also subject to the provisions of the Company’s Insider Trading Policy.

Corporate Opportunities

All executive officers and directors owe a duty to the Company to advance the Company’s legitimate interests when the opportunity to do so arises. We do not take opportunities personally, or for the benefit of friends or family members, that are discovered through the use of Company property, information or position without the prior consent of the Board. We also do not use Company property, information or position for personal gain. Our directors and officers are also prohibited from competing with the Company.

Confidentiality

We protect confidential information. Confidential information includes proprietary information such as our trade secrets, patents, trademarks, copyrights, business, marketing plans, sales forecasts, processes, databases, records, salary information, and unpublished financial data and reports, as well as any non-public information that might be of use to competitors or harmful to us or our customers if disclosed. It also includes information that suppliers and customers have entrusted to us on a confidential basis. If disclosure of such information is required by applicable law or legal proceeding, we will comply with all applicable legal requirements and notify the General Counsel & Senior Compliance Officer to best help protect the Company from any harm that such disclosure may, or may reasonably be expected to, cause.

Fair Dealing

In any dealings with the Company’s customers, suppliers, competitors and employees, executive officers and directors should endeavor to deal fairly. Neither executive officers nor directors should take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts or any other unfair dealing practice.

Discrimination and Harassment

The diversity of our employees is a tremendous asset. We provide equal opportunity in all aspects of employment and will not tolerate discrimination or harassment of any kind. Derogatory comments based on racial or ethnic characteristics, unwelcome sexual advances and similar behavior are prohibited.

Protection and Proper Use of Company Assets

We should protect the Company’s assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company’s profitability. All use of Company assets by an executive officer or director should be for legitimate business purposes related to the Company; provided, however, that incidental personal use may be permitted.

Payments to Government Personnel

In compliance with the United States Foreign Corrupt Practices Act we do not give anything of value, directly or indirectly to officials of foreign governments or foreign political candidates in order to obtain or retain business. We do not promise, offer or deliver to any foreign or domestic government employee or official any gift, favor or other gratuity that would be illegal. Our General Counsel & Senior Compliance Officer can provide guidance on these matters.

Reporting Illegal or Unethical Behavior

In order to encourage good faith reports of illegal or unethical behavior (including violations of this Code), we keep all reports confidential and do not allow retaliation for reports of misconduct by others. It is also our duty to cooperate in internal investigations of alleged misconduct.

Executive officers and directors must practice and promote ethical behavior. Through the adoption of this Code, the Board hereby (a) encourages executive officers and directors to report violations of this Code; (b) encourages employees to talk to supervisors, managers and other appropriate personnel when in doubt about the best course of action in a particular situation; (c) encourages employees to report to appropriate personnel violations of laws, rules, regulations or the Company Code of Conduct; and (d) confirms that it will not condone retaliation for reports made in good faith.

Compliance Procedures

Executive officers and directors should communicate any possible violations of this Code promptly to (a) the Chairman of the Board, or the Chairman of the Audit Committee, if the possible violation involves a director or executive officer, or (b) the General Counsel & Senior Compliance Officer, if the possible violation involves another officer or employee. Potential violations will be investigated by the Audit Committee, or by a person or persons designated by the Audit Committee. All executive officers and directors are expected to fully cooperate in any internal investigation of possible violations of this Code. Upon any determination that there has been a violation of this Code, the Audit Committee or the General Counsel & Senior Compliance Officer will take such preventative, disciplinary or other action as they may deem appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violation of the law, notification of appropriate governmental authorities.

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Consistent with NYSE listing requirements, any waiver of this Code for a director or executive officer may only be made by our Board or a committee of the Board and any such waiver will be promptly disclosed to the public. Additionally, this Code will be included on the Company's website and will be made available upon request sent to the General Counsel & Senior Compliance Officer.

Adopted September 25, 2024