

Corporate Policy

Subject:	Compliance and Ethics Overview		
Policy ID:	P&C_Compliance_108	Created Date:	7/11/2014
Authorized By:	Jennifer Thompson Kinberger, Director, Corporate Compliance	Review Date:	6/19/2024
Department:	People & Culture: Corporate Compliance	Approval Date:	8/9/2024

PURPOSE:

The purpose of the Compliance & Ethics Program is to encourage a company-wide culture of ethical behavior, while monitoring for potential violations of State and Federal regulations, and/or MTM's internal corporate policies.

POLICY:

U.S. Federal Sentencing Guidelines-Section 8B2.1 (a) of the revised guidelines, November 2018 and Chapter 21 of the CMS Medicare Managed Care Manual outline the core components of an "effective" Compliance and Ethics program. The Corporate Compliance Committee, as part of the Compliance Program, will ensure MTM incorporates the seven critical elements into its routine operations.

Those seven components include:

1. Written Standards of Conduct, Policies, and Procedures
2. Compliance Officer, Compliance Oversight Committee, and High Level Oversight
3. Education and Training
4. Effective Lines of Communication
5. Well Publicized Disciplinary Standards
6. Effective System for Routine Monitoring, Auditing, and Identification of Compliance Risks
7. Procedures and Systems for Prompt Response to Compliance Issues

DEFINITIONS:

Term	Description
MTM	Medical Transportation Management, Inc. and all Subsidiaries and Affiliates.

Medical Transportation Management, Inc. ("MTM") as referenced in this Corporate Policy and Procedure shall be applicable to all MTM Subsidiaries and Affiliates.

RESPONSIBILITY:

1. Code of Conduct and Compliance Policies and Procedures: MTM's Code of Conduct and the Compliance Policies and Procedures are designed to guide and assist all MTM employees, including board members, officers, directors, managers, supervisors, and front-line staff, as well as all representatives of the organization including sub-contracted downstream entities and their staff.
 - a. The Code of Conduct presents overarching guidelines to follow to allow for ethical decision-making, and to reinforce the emphasis the organization places on proper compliance conduct. The Code of Conduct outlines the ethical attitude of the company with an emphasis on applicable laws and regulations. It is the responsibility of management to enforce, explain, and exemplify the Code of Conduct throughout the organization.
 - b. Compliance Policies and Procedures will include guidance on compliance matters including, but not limited to the Compliance Hotline, Fraud, Waste, and Abuse, Risk Management, and Exclusion Checks.
2. Compliance Officer and Corporate Compliance Committee
 - a. The Compliance Officer will report to MTM executives while having direct access to the Board of Directors, Legal Department and CEO whenever necessary. The Compliance Officer will ensure executive leadership is informed of the status of the compliance program, including, but not limited to potential risks to the organization. The Compliance Officer will serve as the chairman of the Corporate Compliance Committee.
 - b. The Corporate Compliance Committee will be comprised of a broad cross section of organizational leadership, including, but not limited to the Compliance Officer, Executive Management, Legal Counsel, Employees or Managers of Key Operational Units, Finance, and Human Resources.
3. Effective Training, and Education, Training, and Outreach is critical to ensure employees and MTM representatives are aware of the laws and regulations that drive our business and have a clear understanding of the company's expectations regarding ethical and honest behavior in the workplace. Mandatory Training will include (1) Compliance Training, (2) HIPAA Privacy and Security Training (3) Fraud, Waste, and Abuse Training, (4) Code of Conduct Training, and (5) Compliance Hotline Training. MTM's Training department will ensure training modules are delivered upon hire and annually thereafter.

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The effectiveness of the training will be measured through related assessments.

4. **Effective Lines of Communication** MTM must provide a method through which individuals may, in good faith, report compliance and ethics violations in a confidential and/or anonymous manner. To allow for this, MTM maintains a Compliance Hotline through which employees and subcontractors may report via phone and online tools. Reports to the Hotline are sent to pertinent individuals involved in the Compliance Program to perform investigation and follow up, as necessary. MTM adheres strictly to confidentiality in relation to Hotline reports, but when information must be used to perform investigation, MTM will never tolerate any form of retaliation or retribution in response to a good faith report. The Human Resource and Legal departments will ensure anti-retaliation and anti-retribution policies are strictly enforced. The Compliance Hotline is communicated to employees and sub-contractors through various methods including, but not limited to MTM Internal Websites and email communications, Posters, and Training Modules.
5. **Well Publicized Disciplinary Standards** MTM must publish disciplinary standards associated with compliance and ethics violations with the goal of encouraging good faith participation in the compliance program. Disciplinary standards for employees involved in violations, which range from mandatory retraining up to termination and prosecution, are communicated in the Code of Conduct, employee training, and MTM Policies and Procedures. Employee discipline will be enforced consistently by MTM's Human Resource Department. Disciplinary standards for subcontractors involved in violations, which range from mandatory retraining up to termination and prosecution, are communicated through contract documentation and required training modules.
6. **Effective System for Routine Monitoring, Auditing, and Identification of Compliance Risks:** MTM must establish and implement an effective system for routine monitoring and identification of compliance risks. The system should include internal monitoring and audits and, as appropriate, external audits, to evaluate MTM's and subcontractors' adherence to compliance requirements. Monitoring, auditing, and reviewing is a task shared by operational management, executive leadership, Internal Audit, and Legal. The monitoring, auditing, and reviewing process will include ongoing risk assessments and when necessary, will result in corrective measures.
7. **Procedures and Systems for Prompt Response to Compliance Issues:** MTM has established and implemented procedures and a system for promptly responding to compliance issues as they are raised, investigating potential compliance problems as identified during self-evaluations and audits, correcting such problems promptly and

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thoroughly to reduce the potential for recurrence, and ensuring ongoing compliance with CMS requirements. As risks are identified through monitoring, auditing, reviewing, and reports to the Compliance Hotline, prompt action should be taken when and if necessary. Actions include, but are not limited to corrective action plans, employee/sub-contractor discipline, retraining measures, and scheduled follow-up auditing.

Though the Compliance Program is led by the Compliance Officer, participation in the program is required for the Board of Directors, all employees, and sub-contractors.

All policies and procedures are reviewed on an annual basis for appropriateness and effectiveness.

REFERENCES:

Control Number	Requirement Statement
0604.06g2Organizational.2	The organization's continuous monitoring program includes establishment of defined metrics to be monitored annually at a minimum, annual compliance assessments across the entire organization, third-party independent compliance assessments performed bi-annually, ongoing status monitoring in accordance with its continuous monitoring strategy, correlation and analysis of security-related information generated by assessments and monitoring, response actions to address results of these analyses, and reporting the security state of the information system to appropriate organizational officials monthly and, if required, to external agencies as required by that agency.

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