

Corporate Policy

Subject:	Compliance Hotline		
Policy ID:	P&C_Compliance_109	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:

MTM is committed to maintaining a culture that promotes the prevention, detection, and resolution of instances of conduct that do not conform to law, regulation, policies, and procedures. To promote and encourage this culture, MTM provides a Compliance Hotline and a web-based reporting option to all MTM employees and subcontractors. The purpose of the hotline/website is to provide a confidential and/or anonymous resource, by which current and former employees and sub-contractors can report suspicions of Fraud, Waste, and Abuse, or violations of MTM company policy, including the MTM Code of Conduct.

POLICY:

Communication:

MTM thoroughly communicates the existence and purpose of the Compliance Hotline to employees, and sub-contractors. This is done through e-mail communications, face-to-face training sessions, on-line training, posters, and internal websites.

Employees and subcontractors are trained to understand when to use the Compliance Hotline, and that it is the responsibility of each of them to report instances of Fraud, Waste, and Abuse or unethical conduct immediately. While supervisors or managers are to be considered the first line of defense, the Compliance Hotline or web-based reporting tool provides an alternate option, if desired. Reporters are given assurances of anonymity, confidentiality, and anti-retaliation through training modules and printed materials.

Third Party Vendor Responsibility:

MTM contracts with a third-party vendor to operate the Compliance Hotline. This vendor must guarantee appropriate standards of privacy and security and specialize in capturing confidential reports

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via phone and the web. The reports to MTM must be quickly disseminated to begin the review/investigation process. The vendor must also provide a web-based Incident Management system which allows for case management and serves as a repository of all related activities tied to a reported incident. In addition to the standard report notifications, risks that pose immediate threats to MTM must be communicated promptly by phone.

DEFINITIONS:

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

RESPONSIBILITY:

1. Incident Management:

- a. Reports will be stored on the incident management website and delivered to the Compliance Officer and MTM executive management via email, as appropriate.
- b. Once a report is received by MTM, the Compliance Officer or designee will review the case and determine the first step of resolution based on the following categories:
 - i. Issue can be resolved immediately: A response to the Reporter via the incident management portal will be handled by the Compliance Officer or another employee designated by the Compliance Officer if requested, and issue closed.
 - ii. Referral to appropriate department: If the issue relates directly to the activities of another MTM department, it will be referred to the appropriate department head for handling. (Example: Fair Treatment to Employee issues will be referred to People & Culture.) The Compliance Officer will be responsible for follow-up to ensure resolution of issue.

2. Timeliness:

- a. The Compliance Officer or appropriate department conducts and resolves any necessary investigations within 30 days of receiving the report.
- b. The Compliance Officer and/or designer acknowledges all hotline reports within 1-5 business days from the time of the report and provide periodic updates based on communicated expectations.

3. Data Collection Reports:

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- a. Summary reports of all pertinent Key Performance Indicators (KPIs) will be presented to the Corporate Compliance Committee on a quarterly basis. Incident tracking, trending, analysis, and benchmarking will be on-going.

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

REFERENCES:

Control Number	Requirement Statement
1508.11a2Organizational.1	The organization institutes a mechanism to anonymously report security issues.

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