MTM Health | MTM Transit

2026

CODE OF CONDUCT

Table of Contents

Communities Without Barriers: A Brief Overview

In every part of our business, MTM Health and MTM Transit (hereafter referred to as MTM) take pride in maintaining high standards of excellence that are embodied by our employees, mission, vision, and core values. To help our employees understand our expectations and how to represent our ideals when interacting with stakeholders both inside and outside of MTM, we have developed this comprehensive Code of Conduct to serve as your guide. Throughout the Code, you'll discover guiding principles that align with all five of our Core Values.

While it is impossible for this Code to cover every situation that may arise, our intent is to set basic principles to guide you in behaving professionally, ethically, legally, and responsibly. If you encounter a situation not specifically outlined in this Code, use your best judgement and seek direction from your Supervisor or the People & Culture Department.

Mission Statement

MTM's mission is to partner with our clients in developing innovative solutions for accessing healthcare, increasing independence, and connecting community resources in the most cost-effective manner. To achieve this, we leverage our core competencies in managing customer service operations and building provider networks.

Vision Statement

Communities WITHOUT Barriers

Our Past, Present, and Future

MTM is a company with a rich heritage that has always tied back to our vision of communities without barriers. After realizing the difficulty health plans and government organizations had in arranging transportation services, Peg and Lynn Griswold founded MTM in 1995. The Griswolds were determined to develop a company that would ensure more people had access to healthcare. Over the next several years, MTM quickly set industry standards and is now one of the largest and most established NEMT brokers, scheduling more than 20 million trips for 12 million members nationwide while handling nearly eight million calls every year. In 2009, MTM's leadership established MTM Transit to help transit agencies meet the transportation needs of their communities, specifically transit dependent populations. Every year, MTM Transit provides 1.7 million annual trips.

"Since our founding in 1995, MTM has always had one goal: communities without barriers. As I look back at the past 30 years—and into the next 30 and beyond—I'm proud of the teammates who have helped us grow and thrive. Without you—our most valued resource—we couldn't be where we are today. And, without a Code of Conduct to guide us all in our daily activities, who knows where we would be! I hope you all familiarize yourself with this Code and remain confident in your abilities to act with MTM's best interests in mind."

Alaina Maciá
President & CEO

Act with Integrity

We strive for professional integrity.

When representing MTM, it's always important to act in good faith in a responsible manner with competence and diligence, and to do the right thing ethically and legally. Consistent with our operating principles, employees should strive to conduct all business dealings and relationships with integrity, honesty, and respect for others, and should always deal fairly and honestly with business and work associates, clients, customers, and others with whom we do business. No employee should knowingly permit any transaction to occur that is not fair to our principles, clients, and customers alike.

Take the Wheel

When faced with a potential ethical issue, it may help to ask these questions:

- Am I certain my actions are legal?
- Am I being fair and honest?
- How will my actions appear with the benefit of hindsight?
- How will the situation be described in a newspaper headline?
- Will I sleep soundly tonight?
- What would I counsel a colleague to do?

We interact appropriately with regulators, auditors, and attorneys.

Government authorities or lawyers for outside parties may contact you regarding audits, requests for information, investigations, or claims against MTM. Bring these inquiries to the attention of the Legal Department before you provide any information or response. It is MTM's policy to cooperate fully with all governmental inquiries, and to respond truthfully and completely in any legal action.

If you are contacted by a third party about an investigation, or otherwise learn of an investigation involving company business, you should contact the Legal Department immediately. In addition, if you receive any written inquiry, subpoena, or other legal document regarding company business, whether at home or in the workplace, from any governmental agency, outside attorney, or other source, notify your Supervisor and the Legal Department right away.

We respect government agencies and officials.

Federal, state or local government agencies often pay directly or indirectly for many of the services that MTM provides. All employees must deal honestly and transparently with government employees and officials. In making proposals to, soliciting business from, or entering into contracts with any government agency or official, all applicable contracting and procurement laws and regulations must be followed. Managers with business units that deal with government entities must be familiar with these rules and ensure that their employees know and comply with them. All reports, claims for payment, invoices, and other documents submitted to any government official must be true, accurate, complete, and compliant with agency and contractual standards.

We avoid conflicts of interest.

Appearances matter when it comes to integrity. Recognize and address conflicts of interest. A conflict of interest is defined as any situation in which any employee's personal interests (including the interests of an employee's friend or family member) interfere with, appear to interfere with, or potentially interfere with MTM's business interests. Along with adherence to our policies and procedures, every MTM employee should operate with a sense of professional objectivity in order to remove the potential for unethical decisions.

No employee should use any position within MTM or information acquired during employment in a manner that may create a conflict, or the appearance of a conflict, between an employee's personal interests and those of MTM. Do not use company property, information, or your position for personal gain, or to compete with MTM. All activities conducted as an employee of MTM should always place the lawful and legitimate interests of MTM over personal gain.

Take the Wheel

I work as a driver for MTM Transit and have a family member that may qualify for ride services under MTM Transit and asks you to give them a ride. What should you do?

You should decline to give your family member a ride and encourage them to contact their local social services agency to determine if they are eligible for transportation. If they are eligible, they should follow the agency directions for transportation.

Is It a Conflict of Interest? *Ask Yourself...*

Recognize the importance of perception in giving and receiving of payments or gifts. This means that even if you give or receive a gift with complete objectivity, the giver or receiver may have the perception that the action will have an unethical influence. Gifts are considered acceptable when they fall within generally accepted business etiquette, are not excessive, could be shared with a group of employees, and when the giving or receiving does not give the appearance of favoritism.

We compete fairly.

MTM values fair, ethical, and legal competition. We do not engage in unfair or anti-competitive practices. While MTM holds expansion in high regard, any new business should be recruited and retained using the highest levels of honesty and transparency. It is very common to obtain information about other organizations, including competitors, through legal and ethical channels. MTM never uses illegal or dishonest methods to obtain this information and we avoid even the appearance of unfairly restricting another company's ability to compete against us.

We maintain accurate business and financial records.

MTM requires honest, accurate, and timely recording and reporting of information in order to make responsible business decisions. All business expense accounts must be documented and recorded accurately in a timely manner. All books, records, accounts, and financial statements must be maintained in appropriate detail and conform to applicable laws, standards acceptable to governmental regulatory agencies and payors, client contracts, and MTM's internal controls.

Take the Wheel

I don't work in finance or accounting. Do these Code requirements regarding keeping accurate records apply to me?

Yes. All MTM employees are personally responsible for ensuring that business records are accurate, complete, and reliable. This same standard applies to all reports and records prepared for internal or external purposes.

I'm not involved in MTM's disclosure process. Am I responsible if MTM fails to report information accurately because of information I record?

Yes. Although management must sign off on financial reports, the information you record can affect our financial reports. Always be certain every transaction you record is accurate.

All records related to client services should be kept in accord with applicable standards, including but not limited to Health Insurance Portability and Accountability Act (HIPAA) privacy and security regulations, licensing, and /or accreditation authorities, state Medicaid authorities, and Centers for Medicare and Medicaid Services (CMS) regulations and guidance. Other non-financial records should be documented and maintained with accuracy, and be free of exaggeration, embellishments, or guesswork. The same principles apply to all business communications, including e-mails, memos, and reports.

Make sure you maintain our high standards. Do not falsify or mischaracterize any record, account or transaction. Do not omit accurate information in an effort to mislead or conceal. Never establish an undisclosed, unrecorded, or off-the-record account for any purpose. Never destroy or dispose of information that might be needed for an investigation, an audit or a legal proceeding. If you receive a legal hold notice, acknowledge receipt and then follow the guidelines in the notification. A legal hold is a process to preserve information that may potentially be relevant to pending or reasonably anticipated legal action, litigation, tax matters, investigations, or other formal matters. If you are unsure about what is required, contact the Legal Department. Records should always be retained and destroyed according to MTM's record retention policies.

We safeguard company assets.

All employees should protect MTM's assets and ensure their proper and efficient use. These assets include, but are not limited to, time, materials, supplies, equipment, and facilities. Theft, carelessness, and waste have a direct impact on profitability. As a standard, all assets are to be used for legitimate business purposes and any suspected incident of fraud or theft should be immediately reported to your immediate Supervisor or to the People & Culture Department for further investigation.

Limited and reasonable use of MTM's assets, such as computers and telephones, where the cost to MTM is insignificant, is permissible, but only with prior approval from your Supervisor. The use of MTM assets, especially technology, should be done with the knowledge that such use will be monitored to ensure compliance. Any information you create, share, or download onto company systems belongs to MTM, and we reserve the right to monitor system use at any time to the extent permitted by law. There should be no expectation of privacy in the use of company property. MTM reserves the right to inspect company property whenever and wherever it is used or located.

Upon separation of employment, all MTM assets must be returned within three business days. Failure to return assets/equipment may result in legal action. Deduction for cost of assets/equipment may be withheld from the employee's final paycheck in accordance with applicable state and federal law. Patents, copyrights, trademarks, and trade secrets are also valuable company assets and may only be used with MTM's knowledge and permission. Remember that MTM owns any work product (such as ideas, processes, and inventions) that you develop or design in your work with us to the extent permitted by law. That ownership continues even if you leave MTM.

Artificial Intelligence.

MTM prohibits the use of any artificial intelligence (AI), machine learning, and advanced analytics tools in any MTM work environments without express written approval from MTM's Data Governance and MTM's Security Team.

Align With Clients

We respect our clients and their members.

All clients and their members must be treated with respect at all times. Any type of abuse (physical, emotional, verbal, or sexual) or neglect of members will not be tolerated. If you suspect another employee is abusing or neglecting a member, you are required to immediately report the matter to your Supervisor, the Chief Compliance Officer, or the Compliance & Ethics Hotline (if, for example, reporting the abuse to your Supervisor is not effective or is otherwise not appropriate under the circumstances).

Protecting the rights of the clients and members we serve is the responsibility of every employee. Our services are provided without regard to race, color, national origin, gender, age, religion, disability, veteran's status, sexual orientation, or gender identity or expression, or as otherwise prohibited by law and within the limits of our contracts. We must always provide our services in a manner that is considerate and respects the personal values and beliefs of those we serve.

We preserve confidentiality.

The nature of your work may expose you to confidential information, such as information about our clients and the members we serve, or trade secret or proprietary information about our company. You have the duty to keep all such information confidential, which means that you cannot share it in electronic, oral, or written form, with anyone outside MTM. In addition, you may disclose confidential information within MTM on a "need to know" basis only, and as specifically permitted by company policies. Examples of confidential, sensitive, and proprietary business information that must be protected includes, but is not limited to, unpublished pricing information, client or potential client lists, information about vendors and subcontractors who have business relationships with MTM, internal policies and procedures, standard operating procedures, business workflows, financial information, and our proprietary software and information technology systems. If you have any questions about what constitutes confidential, sensitive, or proprietary information, ask your Supervisor, the Chief Compliance Officer, or any member of the Legal Department. Please remember that your confidentiality obligations apply both during and after your employment with MTM.

Also, remember not to discuss confidential, sensitive, or proprietary information in situations where you may be overheard. Written information should not be left where others who are not entitled to see it could gain access to it. Electronic communications and equipment must be safeguarded and encrypted where and when applicable, all in compliance with MTM's electronic information security standards and policies. These include, among other things, never giving your password to anyone and never discussing confidential, sensitive, or proprietary information online (e.g., on social media or through unsecured email).

Take the Wheel

I am an MTM Transit employee and see a team member putting hard copies of trip manifests in a trash can. How should you handle this?

Advise your teammate that trip manifests may include sensitive, confidential, or Protected Health Information (PHI) and should be placed in the facility shredding bins, shredded, or otherwise destroyed. If this behavior continues, you can report this information to MTM's Compliance department via the Compliance Hotline: https://mycompliancereport.com/ (code: MTM) or by contacting 888-298-4033.

We strictly adhere to HIPAA at all times.

MTM's role in providing non-emergency medical transportation puts many of our employees in contact with our clients' members' protected health information (PHI) on a daily basis. Strict compliance with HIPAA is a critical aspect of our business. HIPAA-protected information may only be released in compliance with applicable HIPAA and other confidentiality laws and regulations. It is also MTM's policy that only the minimum amount of PHI is used/shared to complete relevant job activities or achieve a specific purpose. All employees must familiarize themselves with HIPAA requirements by reading the materials provided to them and participating in the HIPAA training that is part of our mandatory compliance training. You must ensure that PHI is treated in compliance with the law and MTM's HIPAA policies.

If you have any questions about the correct way to treat information under HIPAA, ask your Supervisor, or consult with MTM's Chief Compliance Officer Tammy Wright, at 636-695-5525 or twright@mtm-inc.net. Notify your Supervisor or MTM's Chief Compliance Officer immediately about HIPAA policy violations, PHI breaches, and any other security incidents involving PHI and ePHI. MTM's HIPAA policies and procedures are available on the MTM Policy & Procedure Library.

Take the Wheel

You work as a Customer Care Representative in MTM's Contact Center. Your new roommate finds out her insurance will pay for her to visit their primary doctor. You recognize your roommate's health insurance plan as one that MTM schedules member transportation for regularly. After you share this with your roommate, she hands you her insurance card and asks if you can schedule transportation for her the next time you're at work. What should you do?

Advise your roommate to contact the plan-provided phone number and schedule her transportation the same as any other member would. Scheduling transportation for friends and/or family members does not align with MTM's protocols and creates a potential conflict of interest. It is important all services are provided following standard processes.

We sell our products and services ethically.

Sales practices means those activities conducted by or on behalf of MTM to influence a customer's decision with respect to a product or service. MTM has established a culture of ethical sales that centers on treating the customer fairly. Our Code, policies, and laws ensure that we conduct business in a manner that ensures fairness, clarity, and transparency. Our ethical sales practices strengthen MTM's reputation and help us earn the trust and loyalty of our customers, as well as the privilege of collaborating with them.

To behave consistently with our standards and values we must:

- Listen to our customers
- Only make statements that are factual, truthful, and completely accurate
- Ensure products developed and marketed are appropriate for the targeted customers
- Allow our customers the freedom to choose appropriate products or services
- Train our sales team to properly advise customers and uphold MTM's high standards

Collaborate to Innovate

We manage appropriate business partnerships.

MTM, as a manager of delegated services, primarily operates in a series of partnerships. Business partnerships refer to both external and internal relationships. Internal business relationships include employees and employers. External business relationships include, but are not limited to:

- Clients
- Contracted transportation providers
- Business associates
- Third party vendors

MTM must manage all of our business relationships in a fair, legal, and objective manner. MTM does not permit or condone bribes, kickbacks, or any other illegal, secret, or improper payments, transfers, or receipts. This applies both to the giving and receiving of payments or gifts. No employee shall offer, give, or transfer any money or anything else of value for the personal benefit of any employee or agent of another business entity for the purpose of:

- Obtaining or retaining any business
- Receiving any kind of favored treatment
- Inducing or assisting such employee or agent to violate any duty to his employer or to violate any law

When communicating with external parties, we must protect MTM's reputation and brand. Always remember that you should never make statements or speak on behalf of MTM unless specifically authorized. All media (e.g. interviews, news releases) and public speaking inquiries should be directed to the Chief Marketing Officer Michele Lucas (p) 636-695-5536, (c) 636-541-2978, mlucas@mtm-inc.net. Simply state that per company policy, all media inquiries must be handled by the Marketing Department. If you receive a media inquiry via email, forward it to #marketing.

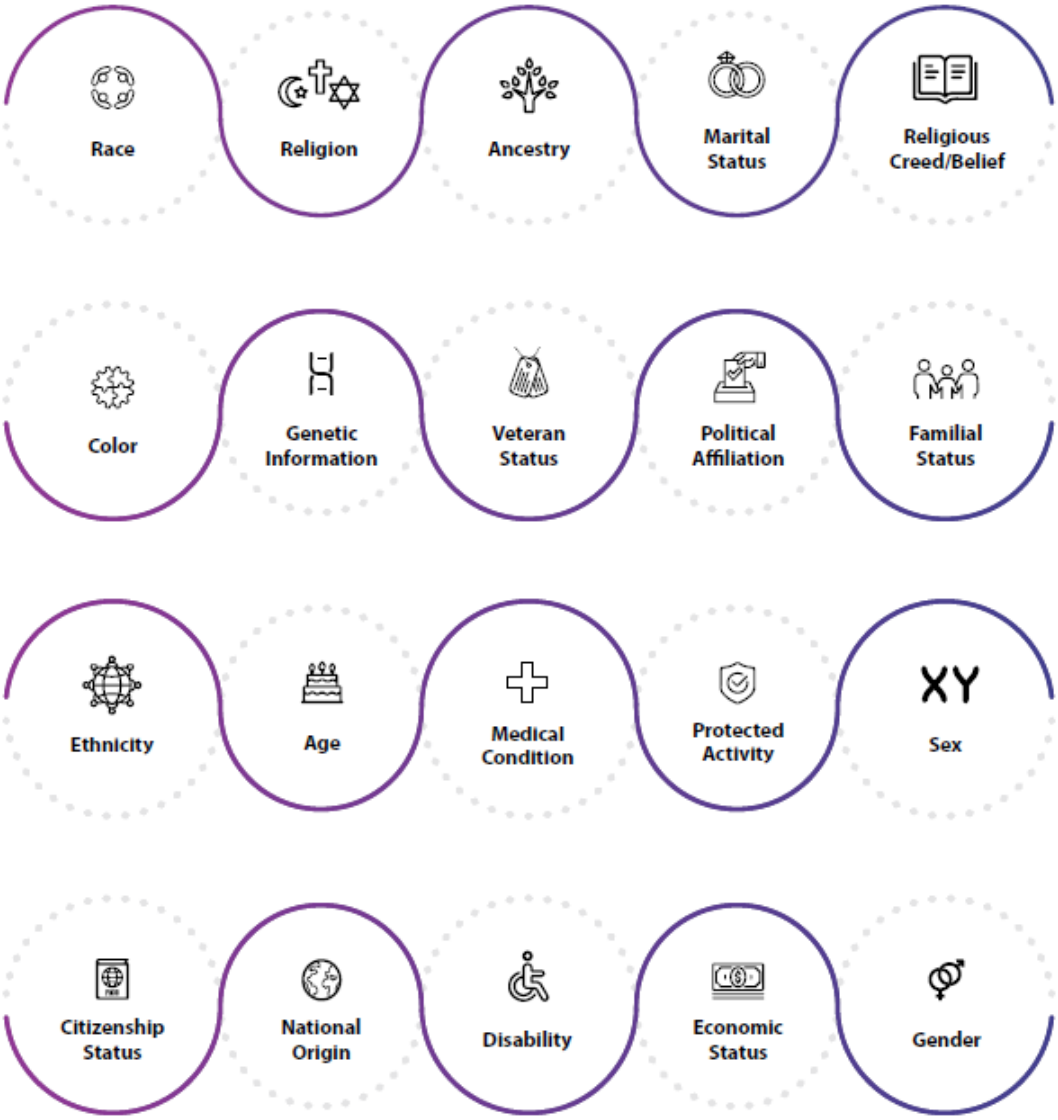
We also want to ensure that we choose suppliers ethically. If you are involved in selecting suppliers for MTM, make your choice objectively, selecting them based on price, quality, and services they offer.

Respect Individuals

MTM has long been an advocate for inclusion and equality within our organization and throughout the communities we serve. We are committed to doing more and working to ensure that diversity, equity, and inclusion are cultural pillars throughout every level of MTM. At MTM, respecting individuals is a part of our core. Why is this important? Because this value, in turn, drives every decision and action our employees take on a daily basis. From every trip we book, to every individual we hire, respecting individuals is always at the forefront.

We extend respect to all.

Now more than ever, MTM will continue to ensure our company is diverse and inclusive. Together, we will push to achieve our vision of communities without barriers—for all. MTM is firmly committed to providing equal opportunity in all aspects of employment and does not practice or tolerate discrimination on the basis of any status protected by law including:



We create a safe work environment.

We treat all people with respect and foster a productive environment free of bullying, harassment, intimidation, and discrimination. At MTM, humiliating jokes, slurs, intimidation, and other harassing conduct have no place. It is not practiced or tolerated. Likewise, sexual harassment is strictly prohibited - including unwelcome sexual advances or sexual favors connected to employment or business decisions.

We embody a workplace of diversity, equity, and inclusion.

By creating a workplace where all individuals feel safe and encouraged to be their authentic selves, we bring out the best in each of our employees. We perform at our peak precisely because we create an environment that brings out the best in each individual. We embrace the advantages that come with having a diverse staff. Above all else, our own diversity allows us to have a greater understanding of the Medicaid populations we serve—people who come from backgrounds of varying cultures, ethnicities, religions, ages, genders, and abilities. By ensuring an inclusive employment culture, MTM is able to develop a workforce that is reflective of our customer base while empowering populations in the communities we serve—putting us one-step closer to achieving our vision of communities without barriers.

Take the Wheel

A new employee joins your team. You see she wears a hijab. On her first day, she approaches you – her Supervisor – and tells you she is a practicing Muslim. As part of her faith, she asks for your help to find a private room where she can pray during her shift. What should you do?

As a member of MTM's leadership, it is important to treat all employees with respect and ensure we offer equal employment opportunity to all of our employees. In response to this request, you should engage your HR Department to ensure MTM is accommodating this employee's religious practice in the workplace.

We integrate respect in all actions.

From the communities we serve, to the members we help, to the employees we hire - we integrate respect for each individual in every action we take and at every stage of the employee experience. MTM's anti-discrimination, bullying, and harassment policy is enforced in all aspects of the employment relationship, including hiring, training, terminations, evaluations, compensation, discipline, promotions, and transfers.

Deliver Value

We prioritize health, safety, and wellness.

MTM strives to provide all employees with a safe and healthy work environment. We are all responsible for following environmental, safety, and health rules and practices and for immediately reporting accidents, injuries, and unsafe equipment, practices, or conditions to a Supervisor and to MTM's Risk Manager (Dana Tod).

In tandem with environmental health and safety, MTM greatly values the health and wellness of its employees. MTM abides by the principle that a healthy workforce is a productive and dependable workforce. Along with voluntary wellness initiatives, employees are expected to perform work in a safe manner, free of the influences of alcohol, illegal drugs, or controlled substances. The use or possession of alcohol, illegal drugs and controlled substances in the workplace will not be tolerated.

We serve our communities.

Building for tomorrow includes protecting the environment and ensuring a healthy future for our employees, customers, communities and other stakeholders. MTM has a longstanding commitment to environmental stewardship and we are proud to be working toward decreasing our carbon footprint. From energy efficiency and green buildings to volunteer projects and responsible investments that benefit the environment, we work to reduce our footprint and build resiliency in a changing world. Continuous improvement is a mantra at MTM. This outlook guides our efforts to decrease our energy use and greenhouse gas emissions through carbon reduction and operational efficiency programs, water reduction strategies, recycling and reuse efforts and more.

We care for people and our community.

Help us preserve the environment. Do your part by using resources responsibly, helping to curb emissions, following environmental laws and regulations, and participating in our sustainability, recycling, and replenishment efforts. Respect, learn from, and support the communities where we live and work and the people in those communities. Understand the impact our business may have on communities, including access to care and breaking down barriers. Take advantage of the many community outreach opportunities that MTM is involved in to make a personal impact.

We support political activities.

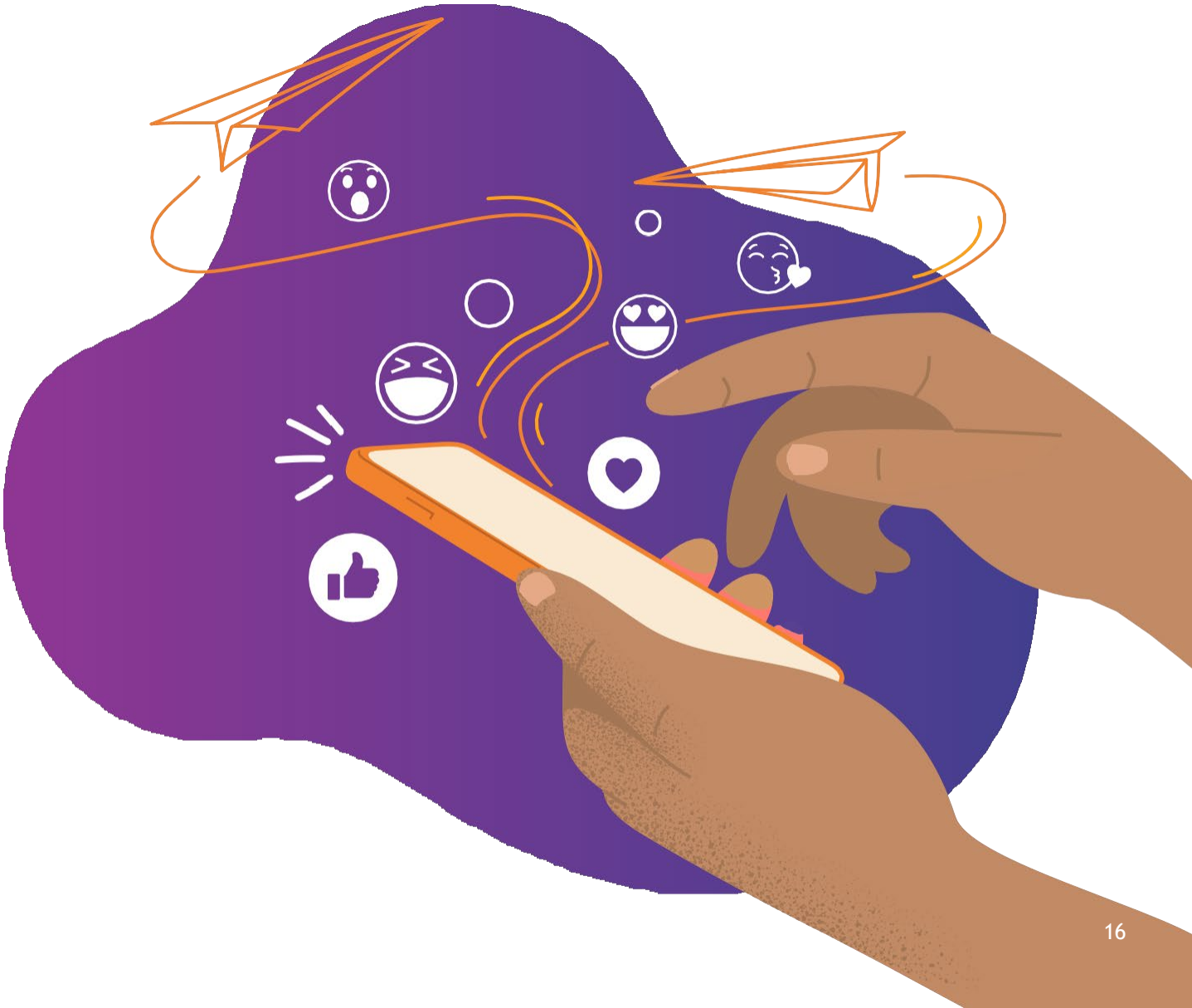
MTM encourages personal participation in the political process so long as it is consistent with applicable law; however, we will not reimburse you for personal political activity and you should not use MTM's reputation or assets (including your time at work) to further your own political activities and interests (including by posting or distributing notices or other materials on or around company premises).

We believe in charitable activities.

MTM is known for our charitable activities through the MTM Giving program, and we have identified charitable organizations and activities that we support as an organization. We encourage you to get involved in charitable organizations that are important to you. Get involved without pressuring or requesting internal and external business partners, and use your own funders and your own time—not MTM's. Requests for formal MTM support should follow the appropriate processes.

We communicate responsibly.

Use social media wisely. If the subject of MTM comes up while you are on social media, make it clear in your postings that you are an MTM employee, and your views are your own - you are not speaking for MTM. Never disclose confidential information about MTM, our customers, suppliers, competitors, or other business partners, and never post anything that might constitute a threat, intimidation, harassment, or bullying. If you realize later that you may have sounded as though you were speaking for MTM in a post, contact your Supervisor, the Human Resources team, or the Corporate Compliance department so MTM can respond and minimize harm that may have been done.



Resources/Additional Info

Violations of the Code

Employees who suspect violations of the letter or spirit of this Code have an obligation to report their concerns to their immediate Supervisor or the Human Resources Department. Reports may also be made anonymously via the ComplianceLine 888-298-4033, https://www.mycompliancereport.com (use code MTM). All reports will remain confidential to the extent possible to allow for a thorough investigation.

Matters of concern include pressure exerted by clients, customers, company personnel, or others to utilize accounts in an unauthorized manner or to take or enable other actions inconsistent with authorized company policies and procedures or this Code.

Violations of the Code of Conduct are taken seriously. MTM reviews each instance on a case-by-case basis, and if necessary, takes swift and immediate action to ensure continuity and integrity of all aspects of our business. Corrective measures may include formal disciplinary action up to and including termination.

How Do I Report a Concern?

Violations of the Code can be reported a number of ways:

- Employees should always start with their immediate Supervisor/Manager for workplace issues/questions.
- If the employee is uncomfortable addressing their Supervisor or the situation involves the employee's direct Supervisor, the employee can escalate to the next level in their chain of command or contact their HR Department.
- Reports can also be made to the ComplianceLine 888-298-4033, https://www.mycompliancereport.com (use code MTM). Reports to the ComplianceLine may be made anonymously.
  - While intake calls to the ComplianceLine are handled by a Third Party Administrator unaffiliated with MTM, any investigation and follow-up is handled by a member of HR Compliance or the Corporate Compliance Department.

Anti-Retaliation Commitment

Report your concerns freely and without worry. MTM will never retaliate against any employee for making a good-faith complaint about discrimination or harassment and participating in an investigation.

What happens when I report my concern?

Compliance & Ethics Hotline

All submitted reports are reviewed by a member of HR Compliance and Corporate Compliance for proper routing. After a report is assigned to either HR or Corporate Compliance for investigation, the caller will be notified their report is under review. Regardless of whether the employee provides their contact information or files anonymously, upon filing the employee will be provided with a report key that can be used to check on the report, make a follow-up, or answer any questions asked. If the report is made anonymously, all follow-up questions and communication will take place through the ComplianceLine platform. If an employee provides their contact information he/she may be contacted directly by the HR Department assigned to their report for follow-up discussion and questions to help facilitate the investigation.

Employee Chain of Command or HR Department

Every complaint will be addressed and investigated in a prompt, thorough, and impartial manner. Managers, Supervisor, and all other employees are required to cooperate fully with the investigation and resolution of all complaints. MTM does not retaliate against any employee for making a good-faith complaint. The employee filing the complaint will be notified when the investigation is complete and that appropriate action, if any, has been taken. MTM does not disclose any corrective action taken against another employee.

What are my responsibilities as a manager?

All managers are expected to exhibit MTM's Core Values in all actions and daily interactions with employees, members, clients, and any other individuals they come into contact with during their tenure with MTM. As MTM's Brand Ambassadors, managers are an integral part of ensuring policies and procedures are applied in a fair and consistent manner. To that end, managers must be familiar with this Code of Conduct and be able to explain and answer employee questions, relying on their leadership chain and HR Department as needed.

What are my responsibilities as an employee?

All employees should familiarize themselves with this Code of Conduct and act in accordance with its guidance and principles. Keep in mind this Code cannot encompass every single situation an employee may face in the course of their tenure with MTM. If in doubt whether certain conduct is in alignment with this Code, an employee should always first consult with their Supervisor, and if that is not feasible, reach out to their HR Department.

This Code of Conduct has been reviewed and approved for appropriateness and effectiveness.

Alaina Maciá

April 21st, 2026

Alaina Maciá
President and CEO

Date

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