



**Purpose**

Elite Medical Transport (ELITE) continually strives to provide high quality emergency care and medical transportation services, and to maintain high standards of integrity in our dealings with our patients' families, as well as our own staff members and those with whom we do business. It is our philosophy that we provide all our services in full compliance with all laws and regulations. This requires the highest standard of conduct from all our staff members. This philosophy of total compliance is the foundation of all that we do. ELITE has approved and adopted this Code of Conduct.

**Policy**

1. Company Policy on Compliance

a) Statement of Commitment

ELITE has been, and continues to be, committed to conducting our activities in full compliance with all federal, state and local laws. Our reputation for quality service and excellent care has been achieved by the personal integrity, good judgment, and common sense of our staff members. Staff members are expected to demonstrate appropriate ethical behavior when conducting activities with patients and their families, fellow staff members, suppliers, vendors, consultants, and those with whom we do business. We are committed to providing each staff member the policies, procedures, and guidelines to be aware of his/her responsibility in ensuring compliance with this Code of Conduct.

b) Purpose of the Code of Conduct

The Code of Conduct provides the approach to guide our conduct in all that we do. It is intended to provide overall guidance for us in providing EMS and medical transportation services in a legal, ethical, and appropriate manner; however, it does not supersede the more specific policies of ELITE. The Compliance and other policies are a supplement to the standards of conduct as presented in general staff member policies and procedures, such as in our personnel handbook, where applicable. Each staff member and all supervisory and administrative personnel will read and understand the Code and subscribe to its standards and procedures.

This Code of Conduct does not address every aspect of ELITE's activities and the applicable legal issues they may entail. Because of changes in ELITE's structure and operations or changes in regulatory requirements, the document is inherently subject to change.

Each staff member, supervisor, and manager will participate in an initial training program explaining the Code. New staff members will receive compliance training during new staff member orientation. Annually, each member of management and administration will receive additional compliance training. Upon completion of each training session or orientation, staff members will be required to sign a statement of participation and attendance.

Each staff member is expected to be familiar with the applicable laws and regulations that govern the matters set forth in the Code of Conduct as it pertains to his or her duties. That familiarity should be part of every staff member's job performance and a regular part of that staff member's review.



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**Code of Conduct (continued)**

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c) Standard of Compliance with Laws

- 1) ELITE personnel, including, where applicable, managers, staff members, agents, consultants and other representatives, should conduct their activities in compliance with applicable laws, rules and regulations. If there is reasonable doubt as to the appropriateness of an activity, staff members should seek advice within the ELITE chain of command. Staff members may also contact the ELITE Compliance Officer at any time if they have questions about the appropriateness of any particular action or course of conduct.
- 2) Policies and procedures regarding certain laws and regulations important to the provision of health care services are a part of the Compliance Plan.

i) Patient Rights to Privacy

ELITE is dedicated to protecting its patients' personal privacy and confidentiality of information consistent with ELITE's mission, applicable laws (including HIPAA, where applicable) and quality Standards

ii) Disclosure

ELITE and its agents will deal honestly and fairly with patients, community members, vendors, competitors, mutual aid companies, payors and other outside contractors. Communication and disclosure information should be clear, accurate and sufficiently complete.

Financial and operational reports should be prepared in accordance with applicable rules and regulations and prepared within ELITE's normal system of accountability.

iii) Patient Billing

ELITE will deal honestly with all payors (e.g., self-pay, insurance companies, HMOs, Medicare, Medicaid, etc.). Claims submitted to Medicare and other governmental and private payors should be complete and accurately reflect the services rendered. ELITE should submit claims for services that are supported by the necessary documentation, while maintaining prompt and proper billing practices.

Billing issues should be resolved according to applicable laws, regulations, organizational policies and, where applicable, payor contracts. Questions regarding patient billing should be resolved expeditiously. If staff members are unsure of the proper response to a question or inquiry, the staff member should contact the Compliance Officer or other responsible person in the organizational chain of command.

d) Integrity of Workforce

We recognize that the personal integrity, good judgment and common sense of our staff members are responsible for our reputation of quality service. To maintain that reputation, prior to entering into a relationship with ELITE, all staff members, contractors, vendors and others will be subject to a reasonable and prudent background investigation, including a reference check.



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**Code of Conduct (continued)**

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Applicants (career and/or volunteer, as applicable) will be asked to disclose any criminal convictions, (as defined by 42 U.S.C. 1320a-7(i) and state law) or any action taken by the government to exclude the individual from participation in federal health care programs. Individuals who have been recently convicted of a criminal offense related to health care or who are listed as debarred, excluded or otherwise ineligible for participation in federal health care programs (as defined in 42 U.S.C. 1320a-7b(f)) may not be considered for employment or a volunteer position with ELITE. Additionally, applicants may be required to divulge their driving record, particularly if their work involves the operation of ELITE vehicles.

e) Conflict of Interest

Staff members are to conduct themselves in a manner that encourages and preserves the trust of those we serve. Staff members should not have financial relationships with parties with which ELITE does business. Prompt disclosure of conflicts of interest should be made to ELITE administration. Violations should be handled in accordance with applicable ELITE disciplinary procedures.

f) Confidentiality

No member of the organization should use confidential or proprietary information for his or her own personal gain or for the benefit of another person or entity, while associated with ELITE or at any time thereafter.

Information concerning a patient is confidential. ELITE personnel should not obtain or divulge details of a patient's condition without a specific professional reason, except as required by law. Violations should be handled in accordance with ELITE disciplinary policies, and/or our HIPAA compliance plan, where applicable.

All new personnel, prior to performing any substantial duties with ELITE that involve patient interaction or information, shall undergo the mandatory privacy training as required under the HIPAA Privacy Regulations (where ELITE is a "covered entity" in accordance with HIPAA).

g) Compliance with Federal, State and Local Laws and Regulations

ELITE will take all actions necessary to ensure compliance with all applicable federal, state and/or local laws and regulations, as well as with the public policies they represent.

h) Anti-Kickback Laws

ELITE will take all actions necessary to ensure compliance with Federal and State anti-kickback laws regarding the acceptance or payment of any remuneration for the inducement of referrals of services or the generation of other business, and shall comply with all applicable regulations regarding self-referrals and kickbacks. Staff members should not give or receive kickbacks, rebates or anything of value to a vendor, patient, physician or other health care provider in exchange for a referral for services or the generation of other business.



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**Code of Conduct (continued)**

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i) Business Arrangements with Physicians or other Referral Sources

ELITE will take all actions necessary to ensure compliance with federal and state laws regarding self-referral and business arrangements. Business arrangements with any referral sources should be set forth in a written contract and should be in accordance with applicable federal and state laws. Payments by ELITE to any referral source should be equal to the fair market value of the services rendered or items being purchased by ELITE and should not be based on the volume of transports or the value of referrals generated by the referral source.

j) Environment

ELITE strives to manage and operate in ways to ensure there is minimal risk to patients, staff members, visitors and the community environment within the confines of ELITE. Every staff member should comply with the safety, hazardous waste and other environmental care policies established by ELITE.

k) ELITE Transactions

ELITE transactions should be completed at fair market value and should not result in a direct or indirect monetary benefit to a staff member. ELITE assets should not be used for the benefit of private individuals or staff members.

l) Anti-Competitive Practices

ELITE will take all actions necessary to ensure compliance with federal, state and/or local laws and regulations that prohibit price-fixing and other anti-competitive practices. This includes compliance with all laws and regulations related to the procurement of EMS or ambulance service for a municipality or other government entity.

m) Gifts to Government Representatives

Staff members should not provide gifts or pay for meals, refreshments travel or lodging expenses for government or public agency representatives, with the intent to influence an official action or decision in an illegal, unethical or unlawful manner.

n) Government Investigation

ELITE has established prescribed procedures and guidelines to ensure an appropriate response to government inquiries. Information disclosed without proper authorization jeopardizes the rights of our patients. We also do not want to hinder in any way a legitimate government investigation. If federal or state law enforcement officials request information from an ELITE staff member, the staff member should direct the federal or state law official to contact the ELITE Compliance Officer. The ELITE Compliance Officer should then communicate with the staff member to ensure that the appropriate documents are provided.

Whenever there is any indication that a government investigation may be underway, under no circumstances will any records or documents that could have a bearing on that investigation be destroyed or altered in any way. Any question about disposition of documents or records should be directed to the Compliance Officer.



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**Code of Conduct (continued)**

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o) Ethical Marketing Practices

All ELITE staff members are engaged in formal and informal marketing efforts. How you conduct yourself, interact with patients and referring facilities are informal marketing practices. Formal marketing practices are the distribution of promotional materials, meetings with referral sources, conducting facility visits or any other activity designed to promote the appropriate utilization of ELITE. When engaged in either practice team members are expected to conduct themselves professionally, communicate the real abilities of the company, not engage in negative conversation about a competing service or remove or deface others marketing materials and treat all with respect. Marketing activities are designed to provide the consumer with actual information about the service and promote goodwill and professional interaction.

p) Individual Judgment

Staff members are often faced with making critical decisions based on activities in the workplace. Remember to always respect others and use good judgment and common sense. If anything within this Code of Conduct goes against your own good judgment, you are encouraged to discuss it with the Compliance Officer or other member of ELITE management.

2. Implementation of the Code

a) Reporting of Violations

It is important to first attempt to resolve issues within the area of responsibility in which they arise. If the staff member knows of a violation or possible violation of the Code or related policies and procedures, it is the staff member's responsibility to report that information immediately to the staff member's supervisor (if applicable) or Compliance Officer.

Ultimately, potential violations should be brought to the attention of an appropriate manager within the organization. The manager, in turn, should report potential violations to the Compliance Officer. If the staff member cannot report a possible violation to their supervisor, the staff member may report such violations anonymously. Information on making anonymous reports shall be disseminated to all personnel. Anonymous reports may be made via a telephone hotline, e-mail or in other forms established by ELITE. Reported violations should be logged, assigned a tracking number and investigated by the Compliance Officer.

In reporting violations to the Compliance Officer, if staff members wish to remain anonymous, they may do so by either not disclosing identifying information or by requesting that their confidentiality be protected. The Compliance Officer should make an effort not to identify an individual making an anonymous report, unless it is subsequently determined that the person engaged in improper conduct. Reasonable efforts shall be expended to assure confidentiality of anonymity requests; however, there may be a point where the individual's identity may become known in connection with the investigation or may have to be revealed if governmental authorities become involved.



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**Code of Conduct (continued)**

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b) Disciplinary Actions

Failure to comply with the standards established by the Code may have severe consequences. Appropriate discipline for violations of the Code, up to and including suspension or termination, may be imposed. Personnel will be subject to disciplinary action if they authorize or participate directly or indirectly in actions that constitute a violation of the law, the Code or related policies and procedures.

c) No Retaliation for Good Faith Reporting of Violations

The success of any compliance policy, including this Code, depends on the prompt and accurate reporting of violations and suspected violations without fear of retaliation. ELITE policy, as well as both federal and state law, does not condone retaliation against a staff member for reporting, in good faith, an actual or suspected violation of the law. Reports should remain confidential except when the nature of the complaint requires disclosure and then should be disclosed only to the extent necessary or advisable to resolve the complaint.

d) Monitoring of Compliance Efforts

An integral component of the Compliance Plan is the continual monitoring, auditing and evaluation of ELITE's compliance efforts. An initial audit of compliance should be conducted to determine the areas in which area-specific compliance programs should be focused. Thereafter, the company ownership and executive staff may authorize audits or the Compliance Officer may conduct audits in response to reports received through the compliance reporting system or through other means. In addition, overall compliance efforts should be reviewed on an annual basis.

3. Questions regarding the Code

ELITE wants to provide timely guidance to its staff members with respect to the Code. If staff members have a question concerning the Code or related policies or feel the need to seek guidance with respect to a particular issue, staff members should consult their administrator or manager, or the Compliance Officer.

4. Acknowledgement

All employees, contractors, consultants and others with pertinent business relationships to ELITE shall complete an acknowledgement of this Code of Conduct.