

LIBERTY AMBULANCE SERVICE CODE OF CONDUCT

I. Purpose

Liberty Ambulance Service continually strives to provide high quality ambulance services for our patients, and to maintain high standards of integrity in our dealings with our patients and their families, as well as our own personnel and other individuals and entities with whom we do business. It is our philosophy that achieving these goals requires the highest standard of conduct from all of our personnel, including full compliance with all laws and regulations and ethical standards. This philosophy of “total compliance” is the foundation of all that we do. Consistent with that philosophy, Liberty Ambulance has implemented a comprehensive Compliance Program that includes this Code of Conduct. The standards contained in this Code of Conduct are a condition of employment for every Liberty Ambulance Service employee.

II. Policy

A. Statement of Commitment

Liberty Ambulance Service is committed to conducting our activities in full compliance with all federal, state and local laws, including but not limited to Health Insurance Portability and Accountability Act (HIPAA), the Fair Labor Standards Act (FLSA), the Americans with Disability Act (ADA), the Occupational Safety and Health Act (OSHA), antitrust laws, the federal anti-kickback statute, the federal False Claims Act, other federal and state fraud and abuse laws, laws prohibiting discrimination and protecting civil rights, and other relevant state and federal laws regarding employment, labor, and the provision of health care to patients.

Our reputation for quality service, excellent care, and compliance with the law and high ethical standards is achieved by the personal integrity, good judgment and common sense of our personnel. Our personnel need to exhibit those traits when dealing with or otherwise engaging in conduct that affects our patients, their families, fellow personnel, suppliers, vendors, consultants and others with whom we do business. We commit to provide each of our personnel the policies, procedures and guidelines with which they must abide in ensuring compliance with this Code of Conduct. Doing the

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right thing is your responsibility and nobody has the authority to instruct you to deviate from this standard. If you need help or are unclear about what to do, you have the responsibility to find help. You can talk with your supervisor or Compliance Officer, or the Liberty Ambulance Compliance Hotline at any time. The Compliance Hotline is available to you at 844-673-8242 or <https://liberty-ambulance.ethicspoint.com> .

B. Training

All personnel will participate in an initial training program covering this Code of Conduct and explaining the Compliance Program. New personnel will receive this initial training during new hire orientation. Annually, each of our personnel will receive a minimum of one hour of compliance training. Additional training may be scheduled based on changes in policies, procedures, or when our compliance program identifies a need for additional training. Upon completion of each training session or orientation, personnel will be required to sign a statement of participation and attendance.

All personnel are expected to be familiar with the laws and regulations that cover the matters set forth in this Code of Conduct as it pertains to their duties. That familiarity will be part of each individual's job performance and a standard part of that individual's performance review.

C. Standard of Compliance with Legal Responsibilities

Personnel must conduct their activities in compliance with applicable laws, rules and regulations, and federal health care program requirements. Further, all personnel will follow all policies and procedures adopted by Liberty Ambulance. If there is reasonable doubt as to the appropriateness of an activity, or at any time if they have questions about the appropriateness of any particular action or course of conduct, personnel should seek advice from the Compliance Officer. **REMEMBER - it is your responsibility to report a compliance concern within 5 days.** You may report concerns to a supervisor/manager, your Compliance Officer, or the Liberty Ambulance Compliance Hotline at 844-673-8242 or <https://liberty-ambulance.ethicspoint.com> .

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If an issue is not covered in the Code of Conduct, personnel should be guided by the following considerations:

- Is the action legal?
- Is the action ethical?
- Is the action fair?
- Is the action consistent with the principles outlined in the Code of Conduct?
- Would I be willing to have the action in the news or on social media for everyone to see?

Liberty Ambulance has adopted, and will revise from time to time, policies and procedures to comply with laws and regulations important to the provision of health care services, including fraud and abuse prevention, detection of violations, and compliance efforts. Personnel are required to follow those policies and procedures. Such policy areas include, but are not limited to the following:

1. Patient Rights

Liberty Ambulance Service is dedicated to protecting its patients' personal privacy and confidentiality of information consistent with our mission, applicable laws (including HIPAA) and quality standards. Communication and disclosure of patient information will be clear, accurate and sufficiently complete, and be in accordance with HIPAA Privacy Rule standards.

2. Financial and Operational Reports

Financial and operational reports will be prepared in accordance with applicable rules and regulations and prepared within Liberty Ambulance's system of accountability.

3. Patient Billing

Liberty Ambulance Service will deal honestly with all payers (e.g., Medicare, Medicaid, self-pay patients, insurance companies, HMO's, etc.). Claims submitted to Medicare and other governmental and private payers will be complete and accurately reflect the services rendered. Claims submitted to Medicare and other federal health care programs for reimbursement for services will be done in accordance with federal health care program participation requirements, and will be supported by necessary documentation.

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Billing issues will be resolved by Liberty Ambulance according to applicable laws, regulations, organizational policies and, where applicable, payer contracts. Questions regarding patient billing will be resolved expeditiously. If personnel are unsure of the proper response to a question or inquiry, they will contact the Compliance Officer or other responsible person in our organization's chain of command for direction.

We will not tolerate the submission of any claims that contain any kind of false, fraudulent, or inaccurate statements. If you see a false claim or report, fix it before it is submitted. If it has already been submitted, contact your supervisor or the Compliance Officer. Failure to do so will lead to disciplinary action, up to and including termination of employment.

4. Integrity of the Workforce

We recognize that the reputation of our organization for honest and quality service depends upon the personal integrity, good judgment and common sense of our personnel. To maintain that reputation all personnel will be subject to a reasonable and prudent background investigation, including a reference check.

Existing personnel, as well as applicants for open positions, will be required to disclose any criminal conviction, (as defined by 42 U.S.C. 1320a-7(i) and state law) and 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 healthcare programs (as defined in 42 U.S.C. 1320a-7b(f)) will not be considered for employment. Additionally, applicants may be asked to divulge their driving record, particularly if their work will involve the operation of vehicles.

We believe in honesty in everything we say and do. If you are making a statement or signing your name to a document, you are confirming that the statement or document contents are true and correct. Do not sign other people's names to documents, and do not share passwords. Our patients and other health care providers depend on us to accurately and honestly document each and every patient record.

We expect all vendors, contractors and subcontractors to follow this code of conduct just as our own employees do.

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5. Conflicts of Interest

Personnel will conduct themselves in a manner that encourages and preserves the trust of those we serve. Personnel will not have financial relationships with parties with which Liberty Ambulance does business without prior disclosure and approval of Liberty Ambulance. Prompt disclosure of conflicts of interest will be made to the Compliance Officer. Violations will be handled in accordance with applicable disciplinary procedures.

6. Confidential Information

Personnel will not use Liberty Ambulance confidential or proprietary information for their own personal gain or for the benefit of another individual or entity, while associated with Liberty Ambulance or at any time thereafter.

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

Posting protected health information or photographs on a web site, social media page or public forum is strictly prohibited, even if the patient is not identified. We do not allow the use of personal devices to text or transmit protected health information for any reason. We do not take or transmit photographs of patients except as required within our policies.

All new personnel, prior to performing any substantial duties with Liberty Ambulance that involve patient interaction or information, will undergo the mandatory privacy training as required under the HIPAA Privacy Regulations.

7. Compliance with Federal, State and Local Laws and Regulations

Liberty Ambulance Service 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 advance.

We will refer any requests for information or statements from the media to our President for a response.

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8. Anti-Kickback Laws

Liberty Ambulance Service 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 will comply with all applicable regulations regarding self-referrals and kickbacks. Our personnel will not give or receive kickbacks, rebates or anything of value to a vendor, patient, physician or other healthcare provider in exchange for a referral for services or the generation of other business. Our agency will ensure that all services are priced at fair market value and not less than the actual cost of providing the service.

9. Business Arrangements with Health Care Facilities and Other Referral Sources

Liberty Ambulance Service will take all actions necessary to ensure compliance with federal and state laws regarding referrals and business arrangements. Business arrangements with any referral sources (such as skilled nursing facilities and hospitals) will be set forth in a written contract and will be in accordance with applicable federal and state laws. Payments by Liberty Ambulance to any referral source will be at the fair market value of the services rendered or items being purchased by Liberty Ambulance and will not be based on the volume of transports or the value of referrals generated by the referral source.

10. Environment

Liberty Ambulance Service strives to manage and operate its business in ways to ensure there is minimal risk to patients, our personnel, visitors and the community environment. All personnel will comply with the safety, hazardous waste and other environmental care policies that have been established by Liberty Ambulance.

We honor our commitment to report during times of emergency, such as hurricanes, flooding, tornados, or epidemics. It is understood that we have chosen careers in public service, and we will be here for our community during times of need.

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11. Transactions

Liberty Ambulance Service transactions will be completed at fair market value and will not result in a direct or indirect monetary benefit to any of our personnel. Also, our assets will not be used for the benefit of private individuals or entities, or for the benefit of our personnel. Liberty Ambulance will deal honestly and fairly with patients, facilities, community members, vendors, competitors, mutual aid companies, payers and other outside contractors.

12. Anti-Competitive Practices

Liberty Ambulance Service will take all actions necessary to ensure compliance with federal, state and 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, ambulance services, or billing service for a municipality or other government entity.

13. Gifts to Government Representatives

Liberty Ambulance Service personnel will 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.

14. Government Investigations

Liberty Ambulance Service 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 and our organization. We also do not want to hinder in any way a legitimate government investigation. If federal or state law enforcement officials or agents request information or documents, personnel receiving the request will direct such persons to contact the Compliance Officer. The Compliance Officer will then communicate with necessary personnel to ensure that the appropriate documents or information 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 manner. Any question about disposition of documents or other records will be directed to the Compliance Officer.

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15. Individual Judgment

Liberty Ambulance Service personnel are often faced with making critical decisions based on matters they encounter in the performance of their work. When making such decisions, personnel will always use good judgment and common sense. If anything within this Code of Conduct goes against personnel's own good judgment, they are encouraged to discuss it with the Compliance Officer or other member of management.

16. Non-Discrimination Commitment

Liberty Ambulance Service will not unlawfully discriminate in providing services and care to the patients we serve, or in the terms and conditions of employment or membership for our personnel. In dealing with patients, family members, guarantors, insurers or other third party payers, we will not discriminate on the basis of race, color, national origin, ancestry, religion, sex, pregnancy, age, disability, genetic information, political belief, military service, ability to pay, or any other protected class. All personnel are encouraged to report to their supervisor or other member of management any incident in which he or she feels there has been discrimination on the basis of race, color, national origin, ancestry, genetic history, religion, sex, pregnancy, age, disability, political belief, military service, or any other protected class.

III. Implementation of the Code of Conduct

A. Compliance Committee/Compliance Officer

The Compliance Officer's responsibilities are to develop, implement and maintain the Compliance Program, oversee compliance training, investigate compliance matters in a confidential manner, and report periodically to management. The Compliance Committee, which is chaired by the Compliance Officer, assists the Compliance Officer in the performance of the Compliance Officer's tasks and works with the appropriate personnel to ensure that this Code of Conduct and other compliance related policies and procedures that govern the business activities of Liberty Ambulance are being followed and are effective. Our designation of a Compliance Officer and Compliance Committee does not lessen each individual's responsibility to become familiar and comply with this Code of Conduct and other compliance related policies and procedures.

B. Reporting of Compliance Concerns

It is important to first attempt to resolve issues within the area of responsibility in which they arise. However, if personnel have a compliance concern or believe there is a possible violation of this Code of Conduct or other compliance related policies and procedures, it is their responsibility to report that information immediately to the Compliance Officer. Reported concerns will be logged and assigned a tracking number, and investigated by the Compliance Officer or referred to the appropriate party for investigation and resolution.

- If the individual is uncomfortable with reporting a compliance concern in a manner that discloses their identity, he or she may report the concern anonymously through our third-party reporting system provided by Navex Global. This system may be accessed by calling 844-673-8242 or on the web at <https://liberty-ambulance.ethicspoint.com>. The individual must make sure to choose “anonymous” in the appropriate section. Information obtained by Navex Global will be entered as a case and forwarded to Liberty Ambulance’ Compliance Officer. Liberty Ambulance will disseminate to all personnel information on how to make an anonymous report of a potential violation or compliance concern. (Please note – after reporting anonymously through Navex Global, neither Navex nor Liberty Ambulance have access to any information which in any way can identify the reporter.)
- In reporting compliance concerns directly to the Compliance Officer, if personnel wish to remain anonymous, they may do so by requesting that their confidentiality be protected. The Compliance Officer will make reasonable efforts not to identify an individual making an anonymous report, unless it is subsequently determined that the individual engaged in improper conduct. Although reasonable efforts will be expended to assure the anonymity of those reporting compliance concerns, circumstances may exist that require the individual’s identity to become known in connection with the investigation such as if governmental authorities become involved. If the nature of compliance complaint or concern requires disclosure it will be disclosed only to the extent necessary or advisable to address and resolve the matter.

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C. Disciplinary Actions

Failure to comply with the standards established by this Code of Conduct and other compliance related policies and procedures may have serious consequences. Appropriate discipline for violations, 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, this Code of Conduct, or other compliance related policies and procedures.

D. No Retaliation for Good Faith Reporting of Concerns

The success of any compliance policy, including this Code of Conduct, depends on the prompt and accurate reporting of concerns and suspected violations without fear of retaliation. Liberty Ambulance does not condone retaliation against any personnel for reporting, in good faith, an actual or suspected violation of the law or our policies and procedures. All personnel should feel comfortable reporting concerns in good faith knowing that Liberty Ambulance will not retaliate, and will maintain, as appropriate, confidentiality and anonymity with respect to such disclosures.

E. Monitoring of Compliance Efforts

An integral component of our Compliance Program is the continual monitoring, auditing and evaluation of our compliance efforts. An initial risk assessment will be conducted to determine the areas in which specific compliance activities, policies and procedures will be focused. Thereafter, risk assessments and audits may be authorized by the Compliance Committee, the Compliance Officer, or management in response to reports received through the compliance reporting system or through other means, or as otherwise deemed appropriate. Overall compliance efforts will be reviewed annually.

F. Consequences of Failure to Comply

In addition to discipline that may be imposed against personnel on an individual basis for the failure to follow this Code of Conduct and other compliance related policies and procedures, Liberty Ambulance Service, itself, can face serious consequences for the failure to comply with federal, state and local law and federal health care program requirements. Such

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consequences include, but are not limited to, civil money penalties, exclusion from the Medicare and other federal health care programs, loss of licensure, and civil, criminal and administrative penalties. Accordingly, adherence to this Code of Conduct, other compliance related policies and procedures, federal, state and local laws, and federal health care program requirements is critical for the continued success and operation of Liberty Ambulance.

G. Revisions

The Compliance Officer and the Compliance Committee will periodically review this Code of Conduct to determine if revisions are necessary and appropriate, and, as approved by management, make all such necessary changes. Any revised Code of Conduct will be distributed to all personnel within thirty (30) days of the effective date of the revisions. All personnel will acknowledge receipt of a revised Code of Conduct upon receipt.

H. Questions Regarding the Code of Conduct

Any personnel who have a question concerning this Code of Conduct or related policies or procedures, or feel the need to seek guidance with respect to a particular issue, will consult the Compliance Officer.

I. Evaluation

The promotion of and adherence to the Code of Conduct will weigh heavily in personnel performance evaluations.

J. Acknowledgement

All personnel receiving the Code of Conduct will be required to complete the following Acknowledgement:

ACKNOWLEDGMENT

I acknowledge that I have received the Liberty Ambulance Service Code of Conduct, that I have read it, and that I will comply with its terms, to the extent applicable and relevant to my duties and responsibilities for Liberty Ambulance, throughout my employment or association with Liberty Ambulance. I understand that the Code of Conduct presents mandatory organization policies and that violation may cause termination of my relationship with Liberty Ambulance.

Name (print): _____

Signature: _____ Date: _____