

nu motion[®]

Code of Conduct



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I. Introduction

Message From our CEO



Dear Colleagues:

Every day, we strive to pursue our Mission of improving the lives of people with disabilities by enabling them to actively participate in everyday life. We intend to do that for many years to come. The only way to sustain our ability to help people over the long term is to do things the right way.

Our business is built on the fundamental value of trust—the trust of our customers, our referral sources, our payors, our regulators, our partners and one another. We build and maintain that trust by holding ourselves to the highest standards of integrity and conduct. Numotion’s Code of Conduct and related policies provide important guidance to conduct our daily affairs. This Code is neither a comprehensive resource nor a substitute for sound judgment; it is a summary of standards intended to drive integrity throughout Numotion. The Code and related policies apply to all employees and the Board of Directors of Numotion. As a team, we have worked very hard to build a successful and well-respected company. We simply cannot - and will not - tolerate unethical or inappropriate behavior.

I know that learning about the Code and related policies takes time, but knowing the rules of the road is absolutely necessary before we do anything else. We must incorporate the letter and spirit of these principles into our actions as we deliver on our commitments to Numotion and each other, our customers and the marketplace, and our neighbors and communities where we live and do business.

Remember, if you have a question or concern about what is proper conduct for you or anyone else, you may always talk to your supervisor or the Compliance Department. You may also report possible violations by calling the Numotion’s concern reporting hotline at 1-800-826-6762, where you may choose to remain anonymous. Now more than ever, building a great company requires an unwavering commitment to the highest ethical standards. Each of us is accountable to do the right thing.

Sincerely,

A handwritten signature in black ink, which appears to read "Mike Swinford". The signature is fluid and cursive.

Mike Swinford

Who We Are



OUR PURPOSE

Our customers are our purpose. Because we offer more access, expertise, advocacy and personalized care, we can better fulfill our mission and impact their lives.

OUR MISSION

Improving the lives of people with disabilities by enabling them to actively participate in everyday life.

OUR VISION

Be the primary source for all mobility, independence and life-enhancing solutions; lead the industry in innovation so all people with disabilities may thrive with personalized products and services.

OUR ACTIONS

Proactive. We anticipate your needs.

Personable. We show you we care with every interaction.

Empathetic. We understand and appreciate your concerns.

Selfless. We place the needs of others above our own.

Honest. We are ethical in all our actions.

Who Must Follow our Code of Conduct?

SCOPE

This Code applies to everyone at Numotion including the Board of Directors and all officers and employees of the company and its subsidiaries when doing work for Numotion. The same high ethical standards apply to all, regardless of job or level in the organization. In certain circumstances, this Code also applies to contractors and temporary colleagues. It is the responsibility of everyone at Numotion to be familiar with all policies and procedures relevant to their job functions.



WHAT IS EXPECTED?

COMPLYING WITH THE CODE OF CONDUCT

To maintain the highest standards of integrity, we must dedicate ourselves to complying with our Code, company policies and procedures and applicable laws and regulations. Violations of our Code not only damage Numotion's standing in the communities we serve - they may also be illegal. Team members involved in violating our Code will likely face negative consequences. Numotion will take the appropriate disciplinary action in response to each case, up to and including termination. In addition, team members involved may be subject to government fines or criminal or civil liability.

YOUR RESPONSIBILITIES

As a Numotion employee, you are expected to comply with both the letter and the spirit of our Code. This means you must understand and comply with all of our policies, laws and regulations that apply to your job, even if you feel pressured to do otherwise. Our Code also requires you to seek guidance if you have questions or concerns and to cooperate fully in any investigation of suspected violations of the Code that may arise in the course of your employment. Periodically, you may be asked to provide a written certification that you have reviewed and understand Numotion's Code of Conduct, comply with its standards, and are not personally aware of any violations of the Code by others. This certification is your pledge to live up to our Code and its expectations and to promptly raise concerns about any situation that you think may violate our Code. Employees who violate our Code put themselves, fellow employees, and our company at risk and are subject to disciplinary action up to and including termination of employment.



How to Use This Code

This Code should help guide your conduct in the course of our business. Many of the principles described in this Code are, however, general in nature, and the Code does not cover every situation that may arise. Use common sense and good judgment in applying this Code. If you have any questions about applying the Code, it is your responsibility to seek guidance. This Code is not the exclusive source of guidance and information regarding the conduct of our business. You should consult applicable policies and procedures in specific areas as they apply.



Reporting Concerns

If you think that an actual or possible violation has occurred, it's important to report your concerns immediately to your supervisor, the HR department, your division's Compliance Officer or our Legal and Compliance department. You are encouraged to identify yourself when reporting a possible violation and Numotion will make every effort to protect your identity. You may, however, report a suspected violation anonymously by calling Numotion's concern reporting hotline, or clicking the "Raise a Concern" icon on your desktop.

To the extent allowed by law, Numotion protects employees who report concerns in good faith with non-retaliation and confidentiality policies. Anything you report is treated with care, and investigated thoroughly and discretely.

What should be reported?

- **Concerns or suspicions regarding healthcare fraud or abuse**
- **Concerns about fair employment practices and HR issues**
- **Violations of Numotion policies or our Company Code of Conduct**
- **Any behavior or situation that threatens your safety or that of your coworkers or our customers**



How can concerns be reported? You have several options.



Talk

- Talk to your Manager
- Talk to your HR Generalist for Employment Issues
- Talk to your Compliance Officer



Click

- Click the "Raise a Concern" desktop icon - report anonymously if desired
- Online at www.numotion.alertline.com - report anonymously if desired



Call

- Call 24/7 access Hotline - report anonymously if desired (800) 826 - 6762 English or (800) 297 - 8592 Spanish
- Call the General Counsel & Chief Compliance Officer at (615) 933-5005



Investigating Concerns

Our Legal and Compliance Department has established processes and procedures to ensure that all internal investigations are conducted by qualified personnel trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly and confidentially. Team members and others involved in internal investigations will be treated with dignity and respect. All investigations and any resulting corrective action will be conducted in compliance with local law, and applicable Numotion policies.

All team members are expected to cooperate in internal investigations, audits, accounting reviews or directions from Numotion's lawyers in connection with lawsuits or government investigative proceedings. Team members and leaders should not interfere in internal investigations or engage in their own fact-finding. Rather, you should promptly raise ethics and compliance questions and immediately report suspicious behavior. Searches of company-provided physical and information technology resources may be required. Retaliation will not be tolerated against any team member who cooperates in these kinds of company activities. If you think you are being retaliated against, or that an investigation is being conducted inappropriately, you should report it immediately using any of the reporting avenues available to you.

After an investigation is completed, appropriate disciplinary and other corrective action will be taken when warranted. Numotion may, in appropriate cases and subject to applicable local law, notify government authorities and cooperate with any resulting prosecution or other government action. In addition, when legally required or otherwise appropriate, Numotion will timely self-report compliance violations to applicable government authorities and cooperate with any resulting official proceedings. The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, will be made by Numotion's General Counsel or his or her designees.



Non-Retaliation

Don't be afraid to speak up and promote an ethical culture at Numotion. We are counting on you to do so. We rely on you to tell us about any suspected misconduct so that we can take action.

We strictly prohibit intimidation or retaliation against anyone who makes a good faith report about a known or suspected violation of the Code or any Numotion policy or procedure, or any law or regulation. We also strictly prohibit any intimidation or retaliation against anyone who assists with any inquiry or investigation of any such violation.

Be assured that the information you provide will be handled discreetly and shared only with those we have a need to inform, such as regulators and those who are involved in investigating, resolving and, if necessary, remediating the issue. If you work with someone who has raised a concern or provided information in an investigation, you should continue to treat the person with courtesy and respect. If you believe someone has retaliated against you or someone else, report the matter to your manager, Human Resources representative, the Legal & Compliance department or our concern reporting hotline.



WHAT DOES "GOOD FAITH" MEAN?

Acting in "good faith" means that you provide all of the information you have and believe you are giving a sincere and complete report. Individuals who take action against a person for making a report or participating in an investigation in good faith will be subject to disciplinary action, up to and including termination, as local law permits.



II. Our Commitment to Our Company and Each Other

Diversity, Inclusion & Equal Opportunities

BACKGROUND

Diversity and inclusivity make us better. Equal opportunity and equal treatment are keys to a fair, unprejudiced approach. We best serve and enrich our own culture through the diverse skills, experiences, and backgrounds that each of us brings to the company. Those different perspectives enable us to better understand the complexity of our customers' needs and to deliver high-value solutions in innovative ways. Numotion is a safe and inclusive work environment where all dimensions of difference are valued and respected.

CORPORATE PRINCIPLE

We offer equal opportunities to everyone. We do not discriminate on the grounds of ethnic or national origin, gender, religion, views, age, disability, sexual orientation, skin color, political views, social background, genetic information or ancestry, marital, veteran or any other characteristics protected by law. All employment related decisions must be based on company needs, job requirements, and individual qualifications.

MY ROLE

I treat everyone around me with respect and dignity. I do not discriminate against anyone. If I see violation of the principles of equal opportunity or equal treatment, I report my concerns to the Human Resources department or any of the contacts listed in the "Reporting Concerns" Section on page 9.

EXAMPLE

You are speaking with a hiring manager one day who tells you that although a particular person was "just as good" as the person who ultimately got the job, the hiring manager passed him over because of the color of his skin.

You should report the concern to HR or Legal and Compliance right away so that appropriate steps can be taken. Numotion does not discriminate on the basis of skin color.



Workplace Safety & Violence Prevention

BACKGROUND

Numotion is committed to ensuring the health and safety of our employees and the well-being of the environment in which they work. We seek to ensure occupational safety and safety for our customers in line with laws and regulations, industry standards, and the health and safety policies of the Company.

CORPORATE PRINCIPLE

All managers have responsibility for ensuring proper safety and health conditions for their employees, and employees at all levels have a responsibility to contribute to our standards for health and safety. Management is committed to maintaining industry standards in all areas of employee safety and health. Our company will not tolerate acts or threats of violence, including extreme or inappropriate verbal or physical threats, intimidation, harassment and/or coercion. Possession of weapons on the job or on Numotion premises is prohibited (including Company vehicles), unless such prohibition is unlawful. No talk of violence or joking about violence will be tolerated.

MY ROLE

I am responsible for observing all safety and health rules, practices and laws that apply to my job, and for taking precautions necessary to protect myself, my co-workers and visitors. I am also responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to my supervisor. As is the case with any violation of the Code, employees have a responsibility to report any unsafe behavior or condition regardless of whether they are directly involved or a witness.

EXAMPLE

You notice a colleague is using bungee cords to hold heavy items in place in his delivery vehicle.

You should inform your manager (and Compliance, if necessary). Not only is this an unsafe practice that could endanger your colleague, it is against Numotion policy and violates the standards of our accrediting body



Drug & Alcohol-Free Workplace

BACKGROUND

Drugs, alcohol, and other legal and illegal substances can impair a person's ability to perform their job functions safely and effectively.

CORPORATE PRINCIPLE

Numotion workplaces shall be free from illegal use, possession, sale, or distribution of alcohol or controlled substances. Legal or illegal substances shall not be used in a manner that impairs a person's performance of assigned tasks.

MY ROLE

I will not use any substance in a manner that impairs my ability to perform my job or puts anyone—whether colleagues or customers—in harm's way.

EXAMPLE

A colleague has a couple of drinks at lunch on Friday and then announces he has just two more deliveries to complete before the weekend.

You should inform your colleague that it is against Numotion policy to deliver the chairs after he's had a drink. Inform your manager if necessary.



Employee Data Privacy

BACKGROUND

Special laws and rules protect the privacy and confidentiality of personal data.

CORPORATE PRINCIPLE

Numotion respects the confidentiality of the personal information of employees. This includes medical and personnel records. Access to personal information is only authorized when there is a legitimate and lawful reason, and access is only granted to appropriate personnel. Requests for confidential employee information from anyone outside our company under any circumstances must be approved in accordance with our policies. It is important to remember, however, that employees should have no expectation of privacy with regard to normal course workplace communication or any personal property brought onto Numotion premises or used for Numotion business.

MY ROLE

I respect the personal information of my fellow employees. I will not access or seek access to anyone else's personal data, except when absolutely necessary and then only in compliance with company policies and applicable law. When in doubt, I will contact Numotion's Human Resources department or the Legal and Compliance Department.

EXAMPLE

You have a friend outside of Numotion who wants you to compile a list of e-mail addresses of your colleagues at the company that may be interested in his business. You figure your colleagues may like the offer and want to help your friend.

You should not share the email addresses. Without a person's express permission, that email address is not appropriate to share.



Proprietary & Confidential Information

BACKGROUND

Numotion holds certain information as confidential and proprietary information, or trade secrets, about our Company, our customers, our prospective customers, our payors, or others. This information is a cornerstone of our business success. Unauthorized sharing of this information could lead to significant losses for the Company and to serious civil and criminal consequences for the employee involved.

CORPORATE PRINCIPLE

Numotion takes great care to protect its trade secrets and confidential information. Employees, officers and directors must maintain the confidentiality of all information entrusted to them, except when disclosure is authorized or legally required. Confidential or proprietary information includes, among other things, any non-public information concerning Numotion, including its businesses, financial performance, results or prospects, and any nonpublic information provided by a third party with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed.

MY ROLE

I will handle all Numotion information carefully and will not disclose it to unauthorized persons. I take great care to protect Numotion's trade secrets and confidential information. I will not disclose any Numotion trade secret or confidential information during or after my employment with Numotion except when legally required to do so.

EXAMPLE

You work in sales and are excited about a new release that the company will soon be offering, but the sales and marketing teams are not prepared to launch. You want to send out a private message on a social networking site about this release to your customers and other contacts who can pass on the word. Since it is a private message, do you need to worry about disclosing confidential info as it has not been released to the public? Your manager said to "get the word out."

Until the sales and marketing teams are ready for the launch, this is proprietary and confidential information of Numotion. You should not share it.



Protection of Assets & Resources

BACKGROUND

Numotion's assets and resources - whether merchandise, vendor samples, corporate credit cards, cash, or information - help our employees serve our customers and succeed. Those assets and resources should be used for business purposes only.

CORPORATE PRINCIPLE

Numotion protects our company assets so we can better serve our customers and maintain value for our stakeholders. Numotion's assets are meant to be used for the benefit of the company and customers. These assets are not for personal gain or for the benefit of others outside of Numotion.

MY ROLE

I will keep Numotion's assets safe from loss, theft, damage, inappropriate use or other forms of fraud.

EXAMPLE

A friend needs some help this weekend doing a DIY project at his house. You offer to swing by with a Numotion van because it has plenty of cargo capacity for trips to the home improvement store and it has many of the tools he'll need for the project.

**This is not an appropriate use of Numotion property.
Numotion vans and tools are for business use only.**



Communications & Social Media

BACKGROUND

Numotion believes it is important to communicate clearly and openly with employees, business partners, customers, and other stakeholders. Our reputation is our brand. Everyone at Numotion has a responsibility to uphold that reputation and follow Numotion's policies around communication.

CORPORATE PRINCIPLE

Numotion communication should be clear and consistent. Clarity and consistency helps maintain the confidence of customers and other stakeholders. Unless expressly authorized, Numotion employees should not speak with the media, investors, and analysts on behalf of our Company, or speak on behalf of the Company through any public medium. If you discuss Numotion-related matters on social media, identify yourself by name and your role with Numotion. You must make it clear that you are speaking for yourself and not on behalf of Numotion. If you publish content to any website outside of Numotion and it has something to do with work you do or subjects associated with Numotion, use a disclaimer. Contact the Communications team or the Legal and Compliance Department for further info.

MY ROLE

I do not issue any public statements for Numotion and always refer requests for public statement to the Communications team. If I make comments on social media or in other public forums, such as trade shows, educational events, or on the internet, I make it clear that I am voicing my personal opinion.

EXAMPLE

On your social media page, you identify yourself as a manager at Numotion, and proud of the work you do for our customers every day. Recently a politician voted against a bill you supported. You post that the politician is a bum and should be thrown out of office.

You are entitled to your opinion, but you must be mindful that Numotion serves customers of all political persuasions. Political issues are often nuanced and not simply explained in short social media posts. You should make it clear that the opinion you are expressing is your own and not necessarily Numotion's.



Maintaining Accurate Records

BACKGROUND

Accurate and reliable records are crucial to our business. Irregularities in our documentation or our accounting and financial reporting practices can have serious consequences for the Company and for those responsible.

CORPORATE PRINCIPLE

We are committed to maintaining accurate company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. We are responsible for helping ensure that the information we record, process, and analyze is accurate, and recorded in accordance with applicable legal or accounting principles. Company records include customer documents, booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business. All company records must be complete, accurate, and reliable in all material respects. There is never a reason to make false or misleading entries.

MY ROLE

I ensure the integrity of all records for which I am responsible. I organize my work practices so that information is entered into Company systems accurately and promptly. I never fraudulently alter any documents. If I have questions about correctly entering data or managing records, I contact my manager or the appropriate responsible person.

EXAMPLE

Your team is close to making budget this month, but needs to deliver just one more chair. The last day of the month was on a Saturday, but no one was available to deliver that last chair. When your team delivers it on Monday, everyone, including the family receiving the chair, agrees to sign and date the document as if the chair had been delivered Saturday.

Don't do it. Documents must be signed accurately. Lying about or changes dates can have very serious consequences both for Numotion and for the individuals involved.



Records Management

BACKGROUND

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. By law, we must retain certain records for a defined period of time; other records are kept for specified periods as a matter of good business practices. We must always have confidence that our records are never altered.

CORPORATE PRINCIPLE

Records consist of all forms of information created or received by Numotion, whether originals or copies, regardless of media. Examples of company records include paper documents, e-mail, electronic files stored on hard drive, disk or any other medium (CD, DVD, USB data storage devices, etc.) that contains information about our company or our business activities.

All records are the property of Numotion and should be retained in accordance with our Records Retention Policy. We are responsible for properly labeling and carefully handling confidential, sensitive, and proprietary information and securing it when not in use. We do not destroy official company documents or records before the retention time expires, but do destroy documents when they no longer have useful business purpose. Refer to the Records Retention Schedule as implemented in your department for more specific retention and destruction guidelines.

MY ROLE

I will follow Numotion's document retention policies and practices. I will never inappropriately or fraudulently alter a document. I understand that Numotion's records must be accurate.

EXAMPLE

You know that a state Medicaid requires Numotion to retain records for 3 years. A colleague suggests that you can delete scanned documents for a Medicaid beneficiary after only two years.

Don't do it. Reach out to the Legal and Compliance Department to confirm the document retention requirements. It is critical that Numotion comply with all applicable records retention requirements of all its regulators and payors, as well as applicable records retention laws.



Conflicts of Interest

BACKGROUND

A conflict exists when your personal, social, or financial interests, duties, obligations or activities, or those of a family member are, or may be, in conflict or incompatible with the interests of the Company. Conflicts of interest expose our personal judgment and that of our company to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us.

CORPORATE PRINCIPLE

Business decisions should be made with integrity and not influenced by a conflict of interest. All decisions are made on the basis of objective criteria for the best interests of the Company.

MY ROLE

I will make prompt and full disclosure of any situation that may involve an actual or potential conflict of interest. I will contact the Human Resources department or the Legal and Compliance Department to make such disclosures, or to report any questions, problems or issues regarding conflicts of interest.

EXAMPLE

Your manager asks you to review bids from several manufacturers. One of the manufacturer's senior sales representative is your brother-in-law.

Inform your manager of the relationship and request that someone else review the bids to avoid the appearance or existence of a conflict of interest.



III. Our Commitment to Our Customers and the Marketplace

HIPAA, Data Privacy, and Confidential Information

BACKGROUND

The Privacy and security of much of our customer's information is governed by HIPAA. As a general rule, customer data should be shared only as absolutely necessary for the treatment of our customers, to receive payment, or to conduct the necessary operations of our business. We should share only the minimum amount of data necessary in every situation.

CORPORATE PRINCIPLE

Numotion respects the privacy of all its customers and business partners. We must handle personal data responsibly and in compliance with all applicable privacy laws and company policies (including our records retention requirements). Personal data is information that can directly or indirectly identify an individual, such as name, contact information, and health-related information.

MY ROLE

I will follow all applicable laws and regulations, including HIPAA, as well as Numotion policies and honor any confidentiality agreements Numotion has in place with business partners. I will collect, use and process such information only for legitimate business purposes and limit access to the information to those who have a legitimate business purpose for seeing the information. I will take care to prevent unauthorized disclosure.

EXAMPLE

You have just delivered a chair for a very excited young customer who is thrilled with her new chair. In the excitement, you snap a selfie with the customer and immediately post it to your social media page, giving the customer's first name only, and describing how great the chair meets her needs.

You should never post anything about a customer to social media without a proper release form. Even a picture of the customer with no other information could violate federal and state law and create serious problems for Numotion. Giving names, addresses (including geographic tags on social media), and describing clinical needs only compounds the issue.



Anti-Trust & Fair Competition

BACKGROUND

Fair competition is governed by strict laws prohibiting collusive or unfair business behavior that restricts free competition. Complying with these laws ensures that consumers—our customers—are protected, and so are we. The anti-trust laws are complicated and failure to follow them could lead to significant penalties for both Numotion and the employees who violate these laws.

CORPORATE PRINCIPLE

We believe in free and open competition. We earn business solely on the basis of merit. We do not enter agreements with competitors to fix prices, rig bids, alter the terms of a sale, alter production output, or divide markets or customers. In addition, attempts to discriminate in prices or terms of sale among our customers, or to otherwise restrict the freedom of our customers to compete, may sometimes be illegal. Legal issues may also arise if we refuse to deal with certain customers or competitors.

MY ROLE

When I come into contact with our competitors, I do not share information about Numotion's current business conduct. I do not receive information from competitors about their current business conduct. I avoid conversations with competitors about important issues like prices, pricing, market analyses, business plans, or other confidential information.

EXAMPLE

You bump into a competitor while at a referral site. The conversation drifts toward some sensitive areas. The competitor asks you about Numotion business plans and pricing, and offers to share the same information about her company. She also suggests that in competitive situations where insurers look for more than one bid, if you agree not to underbid her business, she'll agree not to underbid yours.

You immediately make it clear to your competitor that you will not talk about pricing issues. You also point out that you cannot agree (formally or informally) to not compete with her in competitive situations. Apart from the unauthorized disclosure of the Company's confidential information, this conversation could lead to violations of anti-trust laws (including price fixing and bid rigging) and could have dramatic consequences for you personally, for Numotion, for your competitor, and for her company. Document the conversation immediately and report it to your compliance officer or to the General Counsel.



Obtaining Competitive Information Fairly

BACKGROUND

Gathering information about competitors—often called competitive intelligence—is a legitimate business practice. Doing so helps us stay competitive in the marketplace; however, we must never use any illegal or unethical means to get information about other companies.

CORPORATE PRINCIPLE

Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet. Under certain circumstances, you may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) or by obtaining a license to use the information or actually purchasing the ownership of the information. When working with consultants, vendors, and other partners, ensure that they understand and follow Numotion policy on gathering competitive information.

MY ROLE

I will not use misleading, deceptive, or illegal practices to gather information about competitors. If I have a question about whether a practice is appropriate, I will contact the Legal and Compliance Department.

EXAMPLE

A colleague comes to you and tells you he was able to learn what a competitor is quoting customers by calling one of the competitor's sales people and pretending to be the parent of a child with a disability. He told the sales person that Numotion had already done a fitting and quoted out the chair and now he wants to compare prices. So he verbally gives the sales person specs and is given a quote. What should you do?

You should reach out to your manager or the Legal and Compliance Department. It is never acceptable to obtain competitive information using deceptive practices. In fact, competitive information should be gathered only after legal has reviewed and approved the method by which someone proposes to gather the information.



Honest Advertising

BACKGROUND

The law requires truthful representations about our Company and the products we sell. Such requirements are in line with our principles of transparency and integrity and ensure that our customers can make appropriate decisions about what is best for them.

CORPORATE PRINCIPLE

We accurately represent Numotion and our products in our marketing, advertising and sales materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values. Sometimes it is necessary to make comparisons between our products and our competitors. When we do we will make factual and accurate statements that can be easily verified or reasonably relied upon.

MY ROLE

I will accurately represent Numotion, and the products we sell, to our consumers, to our payors, and to our regulators. I will not omit important facts or make false claims about our products, our company, or our competitors.

EXAMPLE

A customer receiving a new chair excitedly asks if the chair can handle certain rugged situations. You've seen other customers successfully use the chair that way, but you know the manufacturer recommends against it; the chair is intended for indoor use.

You should remind the customer that the manufacturer recommends against using the chair that way. It was not designed or built for such use.



Anti-Money Laundering

BACKGROUND

Money laundering is a global problem with far-reaching and serious consequences. Money laundering occurs when someone converts illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose Numotion and individuals to severe sanctions.

CORPORATE PRINCIPLE

Our company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws and will conduct business only with reputable customers involved in legitimate business activities and transactions.

MY ROLE

I stay vigilant to observe any suspicious conduct on the part of customers, business partners, third parties, or even colleagues when it comes to financial practices and legitimate business transactions. I follow all Company policies and procedures for recording and posting transactions within my area of responsibility. If I have concerns about unusual financial practices I will contact Numotion’s Controller or any of the contacts listed in the “Reporting Concerns” Section on page 9.

EXAMPLE

A customer regularly asks to purchase expensive items with cash at non-discounted prices, despite the fact that his insurance will cover the items. On multiple occasions, he then seeks to return the items for a full refund.

You should let the Finance and Legal teams know about this type of activity. It may simply be a customer with solid financial resources who is particularly picky, but it may also be someone who is using cash purchases from Numotion to launder illegal money.



Selection and Use of Third Parties

BACKGROUND

Numotion does business with a wide variety of suppliers, service providers, and others. With some we have contracts, with others we do not. We treat them all with the same high levels of respect with which we treat one another, and we have the same high expectations of their behavior.

CORPORATE PRINCIPLE

We believe in doing business with third parties that embrace and demonstrate high principles of ethical business behavior. We rely on suppliers, contractors, and consultants to help us accomplish our goals. They are part of the Numotion team and should be treated according to our values. To create an environment where our suppliers, contractors, and consultants have an incentive to work with Numotion, they must be confident that they will be treated in an ethical manner. We offer fair opportunities for prospective third parties to compete for our business. The manner in which we select our suppliers and the character of the suppliers we select reflect on the way we conduct business.

MY ROLE

I do not show bias in favor of a supplier or service provider without objective reasons that demonstrate Numotion's best interests. I avoid any conflict of interest. I follow all of Numotion's policies and procedures regarding selecting and procuring products and services.

EXAMPLE

A vendor is invited to attend Numotion's National Leadership Conference. Once there, he makes advances at several female employees of Numotion.

You should bring this to the attention of management. Numotion would not tolerate this behavior among its own employees and it will not be tolerated from a vendor.



Healthcare Fraud & Abuse - Kickbacks & Bribes

BACKGROUND

Fraud and abuse are serious concerns for the government and other payers we work with. They lead to decisions based on improper grounds, prevent fair competition, and undermine integrity. They can lead to serious civil and criminal consequences for Numotion and for any employee involved in the conduct.

In the healthcare context, fraud and abuse can come about in very simple ways. For example, gifts to or from customers, referral sources, manufacturers, and payors can create conflicts of interest, or worse, could be considered kickbacks that violate federal and state laws. Gifts to or from customers, referral sources, manufacturers, and payors can create conflicts of interest, or worse, could be considered kickbacks that violate federal and state laws. Submission of inaccurate claims can also violate federal and state laws or cause Numotion to violate its contracts with payors. The penalties to Numotion and employees who engage in inappropriate conduct can be harsh.

CORPORATE PRINCIPLE

The Anti-Kickback Statute, the Stark Law, the False Claims Act, and other laws prohibit bribes, including inappropriate gifts and entertainment. No Numotion employee, officer, agent, or independent contractor acting on our behalf may offer or provide bribes, including gifts and entertainment, or other improper benefits in order to obtain business or an unfair advantage. No gift, favor, or entertainment should be accepted or provided if it will obligate, or appear to obligate, the receiver. Giving or accepting bribes, inappropriate, lavish or repeated gifts, or other benefits is always prohibited, even if acceptable by local custom. Similarly, requesting or soliciting gifts or services, or requesting contributions from vendors, suppliers or other business partners for yourself or for Numotion, is prohibited. Refer to Numotion's policies regarding gifts, meals and entertainment for more detail.

MY ROLE

I never offer or accept improper inducement, including gifts and entertainment, in exchange for business or a recommendation for business—from customers, from payors, from referral sources, or from anyone else. I am responsible for staying informed of Numotion's policies and procedures around giving and accepting gifts.



EXAMPLES

A good referral source, with whom you have worked for years, has an opportunity to attend an education event out of town, but their department has used up its travel budget for the year. They approach you to ask whether Numotion would fund the trip, and they gently remind you about what a great partner they've been over the years by referring so much business to Numotion. What should you do?

You should politely decline, pointing out that Numotion's policies, and federal and state law, prohibit this sort of thing. The simple request of asking you for something valuable (i.e., paying for a trip) in exchange for business, whether past or future, can be considered a kickback. It puts the referral source and Numotion in a bad position.

You get invited to attend a football game with a wheelchair manufacturer, whose wheelchairs you often sell. They're paying the tab for the tickets and all food and drink. You've been invited because you are one of the leading sales people of these products.

Whatever the reason for the invitation, attending ballgames with manufacturers whose products we sell to beneficiaries of federal or state healthcare programs (including managed care plans) is against Numotion policy and could be in violation of federal and state kickback laws. There are acceptable instances to dine with a vendor or to attend education-related events, but you should confer with your manager or the compliance team to ensure the circumstances are acceptable before accepting an invitation.

A medical supplies customer is talking with his Customer Care rep. When the customer learns that a certain item is not covered by his Medicare coverage, he threatens to take his business elsewhere because, "that other company will give him those supplies for free."

The Customer Care Rep should inform the customer that Numotion cannot give things away for free because it could be a violation of Federal and State laws. Instead, Numotion can work with the customer to determine whether there are other alternatives.

A Medicaid client informs you that she cannot afford the co-pay on an order. She asks you to waive the co-pay and suggests she will order from a competitor if we cannot waive it. You know that the order could still be profitable even if the customer does not pay the co-pay.

The only acceptable way to waive a co-pay is to follow Numotion's process and seek the appropriate approvals. It is not a valid reason to waive a co-pay simply to keep the business; that would be a violation of Numotion's gift policy and could be a violation of both Federal and State law. Instead, Numotion can work with the customer to determine whether there are other alternatives.



Healthcare Fraud & Abuse - Submission of Accurate Claims

BACKGROUND

Billing all payors accurately for goods and services provided is critical to the integrity of our healthcare system. Our customers count on it, our payors and regulators expect it, and we are committed to it.

CORPORATE PRINCIPLE

Numotion bills its payors honestly, fairly, transparently, and with integrity. No Numotion employee, officer, agent, or independent contractor acting on our behalf may falsify or misrepresent a fact on a claim. Dates, signatures, items billed for, medical necessity documentation, and other required information will always be truthful and supported appropriately in Numotion's documentation. Refer to Numotion's policies and standard operating procedures for more information on truthful and accurate submission of claims.

MY ROLE

I always provide accurate information when completing documentation. When required I ensure that the appropriate documentation is present to support a claim. I am responsible for staying informed of Numotion's policies and procedures about submission of accurate claims. If I have concerns about unusual billing or documentation practices I will contact Numotion's Legal and Compliance Department or any of the contacts listed in the "Reporting Concerns" Section on page 9.



EXAMPLE

It is the end of the year. A customer wants her chair in order to avoid paying a co-pay on the chair at the beginning of next year and you need to deliver this chair in order to hit your goal for the year. But not all of the parts have arrived and the chair is inoperable. Someone suggests that you bring the inoperable chair to the customer's home, have the customer sign for delivery, and then bring the chair back to the warehouse until the rest of the parts arrive and you can assemble the chair. Then you can deliver it after it's assembled. What should you do?

Delivering an inoperable chair and asking a customer to sign the delivery ticket violates Numotion policy and could lead to the submission of a false claim in violation of federal and state laws, and the penalties are steep. What's more, you could be helping the customer to commit insurance fraud. Do not deliver an inoperable chair; do not ask someone to sign for delivery of an item they are not truly taking delivery on; and do not falsify records or paperwork. You should reach out to the Legal and Compliance Department to report that someone has suggested such a practice.



Government Customers & Contracts

BACKGROUND

The federal government and state governments are important customers. They are also our regulators. Dealings with the government often come with their own unique sets of rules and any individual breach of the rules could have serious consequences.

CORPORATE PRINCIPLE

We must ensure all statements and representations to government officials are accurate and truthful, including costs and other financial data. If your job directly involves the government or if you are responsible for someone working with the government on behalf of Numotion, be alert to the special rules and regulations applicable to our government customers. Additional steps should be taken to understand and comply with these requirements. Any conduct that could appear improper should be avoided when dealing with government officials and employees. Payments, gifts, or other favors given to a government official or employee are strictly prohibited. Failure to avoid these activities may expose the government agency, the government employee, our company, and you to substantial fines and penalties.

MY ROLE

I am aware that especially strict rules apply in our dealings with governments and government officials. If my job requires me to work in any capacity with government payors (including supporting the submission of bills and claims to any government body), I will familiarize myself with the rules governing Numotion's interaction with that government payor.

EXAMPLE

As part of an opportunity to demonstrate a new product that Numotion sells exclusively, you arrange an in-service at the VA. You'll bring lunch and treats and talk a little about the new product. You plan to invite everyone you know at the VA because this product is so exciting.

You should talk to Legal and Compliance before extending any invitations. The VA may have strict rules about who can be invited to the session, whether you can bring food, the value of the food and beverage, and so on. In addition, if you invite people who have no true business need to be at the meeting and you provide them food and drink, you may be violating Numotion policy and possibly other Federal and State laws.



Interaction with Regulators

BACKGROUND

Government officials and inspectors could visit Numotion sites or contact any of our employees at any time. We cooperate with government agencies and officials conducting lawful government business.

CORPORATE PRINCIPLE

Numotion complies and cooperates truthfully with all government agencies and officials conducting lawful investigations, audits, inspections, or other business. We never interfere with or obstruct lawful government actions. Employees are expected to listen carefully to requests, to notify Numotion's Billing Department or Legal & Compliance Department as appropriate and to work with those departments to cooperate with government requests. Lying to a government official can subject Numotion and the individual to serious legal consequences, in addition to undermining our commitment to integrity.

MY ROLE

I will interact respectfully with all government officials. I am responsible for contacting Numotion's Billing Department in the event of an audit or Numotion's Legal & Compliance Department in the event of an audit or investigation.

EXAMPLE

A state Medicaid inspector arrives at your branch and asks to visually inspect customer records on site as part of an "investigation."

Respectfully confirm the inspector's identity and association with the state Medicaid office. Kindly inform her that you need to reach out to your legal team or compliance officer to ensure that we do things correctly. Then contact Legal and Compliance for further direction.



Providing Quality Products & Services to Customers

BACKGROUND

We are dedicated to quality and customer service. We take great personal pride in the products and services we provide. Our continued success depends on exceeding the expectations of our customers and standing behind everything we do.

CORPORATE PRINCIPLE

Numotion is proud of the products we sell and the services we provide. We are privileged to serve a population with important healthcare needs and we work every day to earn the business we are given. We earn our business compliantly, through hard work, quality products and services, and dedication to meeting the needs of our customers.

MY ROLE

I will treat customers with respect and respond promptly. I will always remember that the person I am dealing with has a story, has good days and bad days, has needs, and above all simply wants to be treated with respect and know that she is being heard. I will listen and ensure that we meet the customer's needs.

EXAMPLE

A customer needs a wheel assembly repaired on her chair. Numotion does not have the appropriate parts in stock, but the customer is in a hurry to have the repair done. Although it is not the manufacturer recommended hardware, you gather up some parts that seem like they will "do the trick." You make the repair and send the customer on her way.

The repair is not done until it is done right. You should explain to the customer that we use the manufacturer recommended parts to help ensure her safety and the proper working of the chair. Order the proper parts from the manufacturer and follow the manufacturer's recommendations and guidelines to complete the repair properly.



Diversity, Inclusion, & Equal Opportunities for Our Customers

BACKGROUND

We serve a diverse population with a wide variety of needs. We honor and celebrate that diversity—it makes us better. Equal opportunity and equal treatment are keys to a fair, unprejudiced approach. Numotion is a safe and inclusive company to work with and all dimensions of difference are valued and respected.

CORPORATE PRINCIPLE

We treat our customers equally, fairly, and with the respect and dignity that all humans deserve. We do not discriminate on the grounds of ethnic or national origin, gender, religion, views, age, disability, sexual orientation, skin color, political views, social background, genetic information or ancestry, marital, veteran or any other characteristics protected by law. We prohibit any type of harassment of our customers, or any other members of the public, including verbal and physical.

MY ROLE

I treat everyone around me with respect and dignity. I do not discriminate against anyone. If I see violation of the principles of equal opportunity or equal treatment, I report my concerns to the Human Resources department or any of the contacts listed in the “Reporting Concerns” Section on page 9.

EXAMPLE

You are speaking with a colleague who tells you that although a Customer A's chair was ready before Customer B's, Customer B received his chair first because your colleague gets annoyed whenever he has to deliver a chair to “those people.” You know your colleague is referring to Customer A and the color of her skin when he says “those people.”

You should report the concern to your manager or Legal and Compliance right away so that appropriate steps can be taken. Numotion does not discriminate on the basis of skin color.



IV. Our Commitment to Our Neighbors and Community

Social Responsibility

BACKGROUND

Being socially responsible means complying with the law as a matter of course. It means being a company that operates with integrity, makes good choices, and does the right thing in every aspect of our business. We are proud of our commitment to compliance and social responsibility.

CORPORATE PRINCIPLE

Numotion complies with all applicable laws and regulations in all of its business activities. We will continually challenge ourselves to define what being a responsible company means to us, and work to translate our definition into behavior and improvements at Numotion.

MY ROLE

For the good of our Company, our customers, and all of our stakeholders, I am responsible to perform my job in compliance with all laws, regulations, and Numotion policies and procedures and with integrity in all that I do.

EXAMPLE

You are responsible for documenting payments from insurance. You receive a payment for \$5000, but you know that the allowable under that plan is only \$4500.

You should consult with the billing team and any other team members who might have insight to make sure there is not something you've overlooked. If Numotion was truly owed only \$4500, it will refund the remaining \$500.



Political Activity & Lobbying

BACKGROUND

Politics and legislation influence and control a tremendous amount about our business and the markets where we conduct it. Numotion supports positions that are in the best interests of the Company and its employees and customers.

CORPORATE PRINCIPLE

Numotion conducts advocacy and lobbying centrally, openly, and in line with the principles of accountability and responsibility. Numotion also encourages personal participation in the political process in a manner consistent with all relevant laws and Company guidelines. You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice but may not make or commit to political contributions on behalf of Numotion. These activities, however, must not be conducted on company time or involve the use of any company resources such as telephones, computers, or supplies. If you express a personal view in a public forum (such as a letter to the newspaper), do not use Numotion letterhead, company e-mail, or reference your business address or title.

MY ROLE

I do not attempt to involve myself in political decisions on behalf of the Company or represent that my views are those of Numotion. I do not use the Company's reputation or assets, including my time at work, to further my own political activities or interests.

EXAMPLE

You've developed a close relationship with a state legislator who often supports causes important to Numotion and its customers. You know that an important bill is currently being considered that could be beneficial to Numotion and you consider reaching out to your state legislator to explain why this is important to Numotion.

Do not approach your acquaintance about the issue. Political lobbying at Numotion is exclusively coordinated centrally and is conducted openly and transparently.



Charitable Contributions

BACKGROUND

Through the Numotion Foundation, Numotion supports communities of common interest, whether geographic communities or those who share common goals or purposes.

CORPORATE PRINCIPLE

In order to comply with applicable laws and avoid conflicts of interest, nearly all donations made by Numotion are made to the Numotion Foundation. The Numotion Foundation, through its Board of Directors who are guided by (and obligated to follow) the Charter and Bylaws of the Foundation, determines the appropriate donations to make to support research, education, and other charitable causes. The Numotion Foundation grants donations only to recognized non-profit (i.e., 501(c)(3)) organizations. Numotion employees may contribute to these efforts, or may choose to contribute] to organizations of their own choice. Numotion employees may not use Company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by Numotion.

MY ROLE

I will follow the Company's policy of directing charitable donations to the Numotion Foundation, which will then independently and in compliance with law and its Charter and Bylaws, appropriately direct charitable donations. I will not attempt to initiate a donation that could damage the reputation of our Company. I will consult the Legal & Compliance department if I have questions about permissible use of company resources.

EXAMPLE

A referral source asks Numotion to sponsor a fundraising event they are hosting. You'd like to give \$500 to support the event.

You must bring your request to your manager. Nearly all charitable donations are handled centrally and through the Numotion Foundation. Individuals are not authorized to commit to charitable donations or sponsorships.



Human Rights

BACKGROUND

All human beings around the world should be treated with dignity, fairness, and respect. We are committed to upholding fundamental human rights.

CORPORATE PRINCIPLE

We respect and promote all regulations in effect to protect human rights. We expect our suppliers and direct contractors to demonstrate a serious commitment to the health and safety of their workers, and operate in compliance with human rights laws. We are committed to following all applicable wage and hour laws and regulations. Anyone paid based on hours worked must report and record all time worked accurately in accordance with established local procedure.

MY ROLE

If I have concerns about human rights abuse in my professional surroundings, I will prevent it or stop it. If I cannot, I will inform my manager or any of the contacts listed in the “Reporting Concerns” Section on page 9.

EXAMPLE

You are responsible for purchasing certain goods. You receive information that a supplier with whom you work is using child labor overseas in their production process and that other employees are exposed to health risks in their production facilities.

Let your manager know about your concern. Numotion will investigate and take appropriate steps if needed.



Environmental Stewardship

BACKGROUND

Numotion strives to provide sustainable, individual mobility solutions. We are aware of our responsibility toward the environment.

CORPORATE PRINCIPLE

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We strive to use energy wisely and efficiently and employ technology to minimize any risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that Numotion business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

MY ROLE

I keep environmental protection in mind in my work and use resources and energy as efficiently as possible. I try to ensure my activities have the smallest possible impact on the environment and comply with applicable environmental protection laws and regulations.

EXAMPLE

A colleague replaces a battery on a power chair and throws the old battery into the trash bin along with everyday trash.

You should inform that colleague that we have specific means of disposing old batteries or you should report your concern to your manager or the EHS champion for your site.



V. A Word on Making Good Decisions

A Word on Making Good Decisions



Finally, a word about making good decisions. The right thing is not always clear, and no Code of Conduct can dictate the proper decision for every situation. But we expect our employees to use sound judgment and good decision-making skills at all times. If at any time you are unsure of whether a particular behavior complies with the principles set out in our Code of Conduct, consider these questions:

1. Did I consider all the relevant information and weigh it properly?
2. Am I confident that my decision is within the bounds of the law and Company policy?
3. Would I stand by my decision if my supervisor and the CEO learned about it?
4. Would I agree that all similar cases should be decided just like this one?
5. Would I stand by my decision if I had to justify it in public?
6. Would I accept this decision if I were personally impacted by it?
7. What would my family say about this decision?

If you consider each of these things and you are still uncertain or believe that an issue is particularly complex or high risk, you have the duty to seek guidance from your supervisor, a manager, the Human Resources department, or the Legal and Compliance Department.

