



WayPoint
Code of Business Conduct and Ethics

MetroAtlanta
Ambulance Service

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Letter from the President & Chief Executive Officer

Dear Employees:

You have joined an organization dedicated to the mission of providing Excellence in Patient Care and Customer Service. The foundation for how we conduct our business, both legally and ethically is outlined in this manual which we have named **WayPoint**. The term waypoint refers to a reference point for the purpose of navigation. Metro Atlanta Ambulance is committed to following the law and encouraging each individual to act with the utmost integrity. As we navigate the ever changing environment of healthcare, we will use WayPoint to help provide you direction and reference. WayPoint provides policy statements that address work-place activities vital to the health of the Company's operations. Each policy within describes what is expected and gives guidance to help meet both legal requirements and our internal ethical expectations. *WayPoint* applies to all of us. We must all adhere to the specific policies developed to guide our actions. *WayPoint* does not cover every situation and does not set forth every applicable rule, however, honest, common sense behaviors using established corporate policies and procedures as a guide along with a personal commitment to ethical behavior does provide a great foundation for success.

Management has the responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. To make the Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Metro Atlanta Ambulance Service, we want the ethics dialogue to become a natural part of daily work.

You are required to be familiar with and understand the Code of Business Conduct and Ethics policies, as violation of these principles may subject you to disciplinary action and/or termination of employment. We encourage you to use **WayPoint** as a reference resource when necessary. Your supervisor can assist you with any questions or concerns. If you do not feel comfortable approaching your supervisor, you may contact the Ethics & Compliance Department or, if you prefer to report an issue anonymously, simply call the *Compliance Hot Line* at 770-693-8432. We are committed to our employees and will work diligently to ensure that questions and issues brought to the attention of the Compliance Department directly, or through the Hot Line, will be kept confidential to the degree possible and that there will be no retaliation for asking questions or raising good-faith concerns regarding possible improper conduct. Our continuing success is dependent upon maintaining our commitment to compliance with all applicable federal, state and local laws and regulations governing appropriate delivery of high-quality healthcare services.

Thank you for your support and your commitment to continually choosing to do the right thing every time.

Sincerely yours,

Pete Quinones
President & CEO



We Act Responsibly

Employees involved in the operations of Metro Atlanta Ambulance Service have an obligation to the organization, their profession, the public and themselves to maintain the highest standards of ethical conduct. To that end Metro Atlanta Ambulance has adopted the following standards of ethical conduct. Adherence to these standards is integral to achieving the objectives of the organization. No person employed by this organization shall commit acts contrary to these standards nor shall they condone the commission of such acts by other in the organization.

Competence

All personnel shall maintain an appropriate level of professional competence by ongoing development of their knowledge and skills. They shall perform their professional duties in accordance with relevant laws, regulations, and technical standards and shall prepare complete and clear reports and recommendations after appropriate analysis of relevant and reliable information.

Confidentiality

All personnel shall refrain from disclosing confidential information acquired in the course of their work except when authorized, unless legally obligated to do so. They shall inform subordinates, as appropriate, regarding the confidentiality of information acquired in the course of their work and monitor their activities to assure the maintenance of that confidentiality. They shall refrain from using or appearing to use confidential information acquired in the course of their work for unethical or illegal advantage either personally or through third parties.

Objectivity

All personnel have a responsibility to communicate information fairly and objectively and to disclose fully all-relevant information that could reasonably be expected to influence the intended user's understanding of the reports, comments and recommendations presented.

We Act Responsibly continued

Integrity

All personnel have a responsibility to:

- To avoid actual or apparent conflicts of interest and advise all appropriate parties of any potential conflict.
- To refrain from engaging in any activity that would prejudice their ability to carry out their duties ethically.
- To refuse any gift, favor or hospitality that would influence or would appear to influence their actions.
- To refrain from either actively or passively subverting the attainment of the organization's legitimate and ethical objectives.
- To recognize and communicate professional limitations or other constraints that would preclude responsible judgment or successful performance of an activity.
- To communicate unfavorable as well as favorable information and professional judgments or opinions to the appropriate persons.
- To refrain from engaging in or supporting any activity that would discredit the organization.

Investigating Suspected Violations

Always be alert and sensitive to situations that could result in improper, unethical or illegal conduct and report your finding immediately. If you have any questions about compliance-related issues or you would like to report a compliance related complaint you should:

- Consult WayPoint
- Speak to your Supervisor
- Contact the Compliance Officer at 770.693.8483
- Contact the Compliance Hotline at 770.693.8432

Every call, question or concern is taken seriously. It is our policy to review, investigate and address reported concerns so that we can ensure that our conduct is compliant with relevant laws and so that we can quickly correct any problems.

We Create a Culture of Open and Honest Communication

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do. When considering any action, it is wise to ask: will this build trust and credibility for Metro Atlanta Ambulance Service? Will it help create a working environment in which Metro Atlanta Ambulance Service can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Metro Atlanta Ambulance Service is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste. Metro Atlanta Ambulance Service is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Open Communication

At Metro Atlanta Ambulance Service we have an open door policy. Every employee should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times. Employees should go to their immediate Supervisor as a first course of action as most issues can be quickly addressed. However, if an employee does not feel comfortable going to their immediate Supervisor, the Company has an employee ethics hotline available 24 hours a day for employees to express their concerns.

We Create a Just Culture of Health and Safety

Health and Safety

Metro Atlanta Ambulance Service is dedicated to maintaining a healthy and safe work environment. A safety manual has been designed to educate you on safety in the workplace. You have a duty to keep your bodies physically fit and your mind mentally alert at all times. Routine choices of good nutrition, regular physical exercise and continuing professional education is expected and required of professional in our industry in order for you to be physically and mentally able to deliver quality services.

The Company strives to operate in a Just Culture which establishes an organization-wide mindset that positively impacts the work environment and work outcomes in several ways. The concept promotes a process where mistakes or errors do not result in automatic punishment, but rather a process to uncover the source of the error. Errors that are not deliberate or malicious result in coaching, counseling, and education around the error, ultimately decreasing likelihood of a repeated error. Increased error reporting can lead to revisions in care delivery systems, creating safer environments for patients and individuals to receive services, and giving the employees a sense of ownership in the process. The work environment improves as employees deliver services in safer, better functioning systems, and that the culture of the workplace is one that encourages quality and safety over immediate punishment and blame. Due to the nature of our industry, what we do and some of the environments in which we operate are inheritably unsafe and beyond our control. We have policies in place that address specific instances that may hazardous and how they should be handled. We all have an ethical responsibility to self-report concerns of safety or near misses as we encounter them.

We Comply with Laws & Regulations

Comply with the Law

Metro Atlanta Ambulance Service's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Metro Atlanta Ambulance Service policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations. Because of the nature of our business, some legal requirements warrant specific mention here.

Interacting with Government Employees & Cooperating with Government Investigations

It is illegal to give anything to a government official or employee in order to influence that government official or employee to use his/her government position and power to help the Company. Not only must we refrain from this activity, we must also avoid the appearance of inappropriate influence. Employees may not buy lunches, give gifts or do anything that directly or indirectly benefits government officials or employees for the purpose of influencing the government official or employee to use his/her position to help the Company without prior approval from the Ethics & Compliance Department.

It is Company policy to cooperate with governmental investigations. Both the Company and employees have the right to be represented by legal counsel during any governmental investigation or inquiry. This means that questioning occurs during business hours or away from Company property. If you are contacted by a third party connected with a governmental investigation or you learn of a governmental investigation, immediately contact the Safety & Risk Manager or the Ethics & Compliance Department.

Sometimes the Company receives a subpoena or other type of legal request for certain information. The Company has developed specific procedures for releasing information in response to subpoenas and legal inquiries. For legal reasons, it is very important that these procedures be followed. Any request for information protected under these circumstances should be immediately directed to the MAAS Privacy Officer (770.693-8483)

We Comply with Laws & Regulations continued

Always Act with Integrity Before, During and After Any Investigation

- Do not destroy documents or information in anticipation of a request for those documents from a government agency or court;
- Do not alter Company documents or records;
- Do not lie or make misleading statements to government investigators during any investigation; and
- Do not pressure anyone to hide information or provide false or misleading information to government investigators.
- NOTE: Documents and information include both paper and electronic forms of storage, such as computer files, e-mails, voicemails, etc.

Maintaining Eligibility to Participate in Government Healthcare Benefit Programs

The federal government and many state and local agencies pay for some of the services that our Company provides to patients. Individuals and/or entities may be debarred or suspected from participating in federal or state programs for various reasons including inappropriate use of federal or state funds. These individuals and/or entities are published in the “Excluded Parties List System,” the Office of the Inspector General’s “List of Excluded Individuals/Entities” and/or individual State websites. The Company will not knowingly employ or contract with any individual or business, with or without pay that is on the federal or state government’s excluded lists as debarred, suspended or otherwise ineligible to participate in the Company’s business endeavors. We take proactive steps to check the government’s lists of excluded and debarred providers to ensure that no employees have been placed on any exclusions list during employment. Employees have a duty to inform the Company of any changes in their eligibility to participate in government programs. Consultants and contractors must be eligible to contract with the Company and must operate in accordance with our Code of Business Conduct that governs ethical corporate behavior and which precludes the hiring of excluded, debarred or ineligible persons or entities. It is the responsibility of our employees to maintain all required credentials, licenses and certifications. We do not allow employees with lapsed or revoked credentials to provide care to patients.

We Comply with Laws & Regulations continued

Abiding by EMTALA

EMTALA violations are a serious matter of Federal Law. The EMTALA responsibility of a hospital with a dedicated Emergency Department (ED) begins when an individual arrives on hospital property (ambulance arrival) and not when the hospital “accepts” the individual from the gurney. (42 CFR 489.24(b)) Once an individual seeking treatment arrives on hospital property or is in the Emergency Department of the hospital, the hospital has an obligation to provide an appropriate medical screening examination and, if an emergency medical condition is determined to exist, provide any necessary stabilizing treatment or arrange for an appropriate transfer.

Failure for a hospital to meet these requirements constitutes a potential violation of EMTALA.

Should the ED be at capacity and no immediate hospital staff available to accept the patient, the MAAS crewmember shall remain with the patient until a staff member becomes available to accept the patient. The hospital staff is obligated to immediately triage the patient upon arrival to rule out the existence of any life-threatening emergency medical conditions.

If a medical crew member should be refused by a hospital to accept a patient that has been presented for evaluation, the crew should immediately contact the EMS Supervisor to respond to the location and demand to speak with the Emergency Department Physician in charge about the situation. Should the patient still be refused, the crew should immediately notify the communication center of the situation (which will be recorded) and transport the patient to another appropriate facility and notify them of the situation. The unit shall be taken out of service to meet with the EMS Supervisor.

Submitting Accurate Claims for Services

We must submit appropriate and accurate claims to all patients and third-party payors for ambulance services provided. The creation and submission of thorough and accurate information regarding the patient encounter is imperative to ensure we seek reimbursement only for those services that are medically necessary and actually performed. We may not submit claims for services that are excessive or otherwise not legally reimbursable. We also must not submit false, fraudulent or misleading claims to any payor.

We Comply with Laws & Regulations continued

Maintaining Appropriate Financial Relationship with Referral Services

There are various state and federal laws governing patient referrals. Anti-kickback laws regulate offers, payments, solicitations and receipt of anything of value in exchange for referring, furnishing or recommending federally-funded business. There are also state and federal laws governing patient referrals by physicians, such as the Stark Law. The Stark Law, when applicable, prohibits physicians from referring patients, reimbursable by federal funds, to an entity providing “designated health services” if the physician or a member or the physician’s immediate family has a financial relationship with the entity, unless an exception applies.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell Metro Atlanta Ambulance Service products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Metro Atlanta Ambulance Service or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor’s trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Metro Atlanta Ambulance Service, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain unauthorized information.

We Comply with Laws & Regulations continued

Health Insurance Portability and Accountability Act (HIPAA)

We are dedicated to protecting the protected personal health information of our employees and patients. We have developed a comprehensive HIPAA Compliance Plan to ensure our organization operates within the local, federal and state guidelines, laws, rules and regulations regarding the privacy, disclosure and security of Protected Health Information (PHI). All employee received HIPAA Compliance training during the onboarding process and as part of their continuing education. We have corporate policies in place specific to protecting patient confidentiality that employees may reference for guidance. All employee shall make it a priority to maintain patient confidentiality and to self-report a potential breach.

Identity Theft Protection (Red Flag Rule)

We are dedicated to protecting the personal information/data entrusted to us by our employees, patients, customers and others and safeguarding against Identity Theft. We have an Identity Theft Protection Program, consisting of policies and procedures, in place to help us identify, detect and respond appropriately to “Red Flags” for identity theft. We shall be vigilant in mitigating issues when red flags are identified. It is the responsibility of the individual to read, understand and comply with the guidelines contained in the Identity Theft Protection Plan.



We Avoid Conflicts of Interest

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Metro Atlanta Ambulance Service may conflict with our own personal or family interests. We owe a duty to Metro Atlanta Ambulance Service to advance its legitimate interests when the opportunity to do so arises. We must never use Metro Atlanta Ambulance Service property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Metro Atlanta Ambulance Service.

Here are some other ways in which conflicts of interest could arise:

Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Metro Atlanta Ambulance Service.

Hiring or supervising family members or closely related persons.

Serving as a board member for an outside commercial company or organization without authorization. Owning or having a substantial interest in a competitor, supplier or contractor.

Having a personal interest, financial interest or potential gain in any Metro Atlanta Ambulance Service transaction.

Placing company business with a firm owned or controlled by a Metro Atlanta Ambulance Service employee or his or her family.

Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Metro Atlanta Ambulance Service employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

We Avoid Conflicts of Interest Continued

Gifts, Gratuities and Business Courtesies

Metro Atlanta Ambulance Service is committed to competing solely on a merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Metro Atlanta Ambulance Service was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Metro Atlanta Ambulance Service does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Metro Atlanta Ambulance Service or customers, or would cause embarrassment or reflect negatively on Metro Atlanta Ambulance Service's reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at Metro Atlanta Ambulance Service. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Metro Atlanta Ambulance Service to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Metro Atlanta Ambulance Service maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Metro Atlanta Ambulance Service is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Metro Atlanta Ambulance Service business.

We Avoid Conflicts of Interest Continued

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Gifts

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Metro Atlanta Ambulance Service does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

We Avoid Conflicts of Interest Continued

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Metro Atlanta Ambulance Service. An employee may never use personal funds or resources to do something that cannot be done with Metro Atlanta Ambulance Service resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of Metro Atlanta Ambulance Service.

We are Accountable for our Actions

Personal Accountability

As the Company entrust you with resources, you must accept personal accountability and responsibility for how you use them and for the resulting outcome of your actions. Each of our individual position responsibilities are part of a greater system designed to deliver high quality medical response, customer service, clinical care and transport. Every position is equally important in the successful delivery of excellence in patient care and customer service. Each of you must take personal accountability in faithfully carrying out the duties of the job assigned to you.

Confidential and Proprietary Information

Company property, as a general rule, should only be used to further the Company's business, unless you receive prior approval in writing by your manager.

Integral to Metro Atlanta Ambulance Service's business success is our protection of confidential and proprietary company information, as well as nonpublic information entrusted to us by employees, patients, customers and other business partners. Confidential and proprietary information includes such things as pricing structures and financial data, patient/customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Employees and those who represent Metro Atlanta Ambulance Service are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use. Generally, we will not use company equipment such as cell phones, computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for authorized company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours. In order to protect the interest of the

We are Accountable for our Actions continued

Use of Company Resources continued

Metro Atlanta Ambulance Service network and our fellow employees, Metro Atlanta Ambulance Service reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Metro Atlanta Ambulance Service's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate. Questions about the proper use of company resources should be directed to your manager.

Media Inquiries

Metro Atlanta Ambulance Service is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Office of the President & CEO. No one is authorized to issue a press release or statement to the media without first consulting with the President & CEO.

Social Media

We are committed to ensuring our staff members' use of social media does not violate Federal or state privacy, copyright, defamation or discrimination laws. The Company is required under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") to ensure that any protected health information ("PHI") that we create, receive, use or store is not improperly used or disclosed through any means, including the Internet. We are also committed to and have a legitimate interest in, protecting our business interests, our working relationships with other organizations and our confidential and proprietary information. Corporate policy No. 101.38 provides specific guidelines on use of Social Media.

Photography

In the interest of protecting confidential documents, patient confidentiality, employee/patient privacy and to prevent the capture of inappropriate data, under no circumstances shall any employee or guest be authorized to take pictures of same while on duty without specific authorization. Contact your immediate Supervisor for clarification if you have questions.

ACKNOWLEDGEMENT
CONFLICTS OF INTEREST DISCLOSURE FORM

I certify that I have received a copy of WayPoint – Metro Atlanta Ambulance Service’s Code of Business Conduct and Ethics. I have read WayPoint and I understand that it outlines my responsibilities as an employee, officer or director (as applicable) of the Company.

I agree to fully comply with the Company’s standards, policies and procedures.

I understand that I have an obligation to report any suspected violation of the Company’s standards, policies and procedures.

I understand that the Company has provided me with access to an Ethics and Compliance Hotline to answer any questions I may have and/or allow me to report any suspected violations of this Code of Business Conduct and Ethics.

I will report any known or perceived violations of the Code to my supervisor or the Ethics and Compliance Department as soon as possible but without unreasonable delay.

I further certify that I have read and understand the Code of Business Conduct and Ethics section entitled CONFLICTS OF INTEREST and that:

- I have no conflicts of Interest
- I have a conflict of Interest and have completed the Conflict of Interest Disclosure Form
- I request assistance in determining whether I have a conflict of Interest

If you checked this second box please describe below:

Please sign and return this form to your supervisor or manager. It will be sent to the Compliance Department and a copy will be placed in your electronic personnel file.

Company _____

Name _____

Position Title _____ Last four digits of SS#: _____

Employee ID # _____ Division _____

Signature _____ Date _____

ACKNOWLEDGEMENT

BUSINESS CODE OF CONDUCT & ETHICS

MetroAtlanta Ambulance is committed to conducting its operations in a lawful and ethical manner. MetroAtlanta Ambulance staff members are required to comply with all applicable laws, regulations, and policies affecting the operations of MetroAtlanta Ambulance's operations. There are specific compliance areas that relate to operations and billing that we all must follow. Some of these areas include the following:

1. Proper Call intake and dispatch procedures and "emergency response" protocols
2. Providing services to the extent necessary for the treatment of the patient;
3. Billing for items or services only when they are properly documented;
4. Proper documentation of "No transport" calls and calls where there was actual pronouncement of death at the scene;
5. Proper documentation and claim submission for transports where there is more than one patient in the ambulance;
6. Proper documentation of multiple ambulances called to respond to emergency calls;
7. Where applicable, proper procedures for the restocking of supplies and drugs used in connection with patients transported to hospitals or other emergency receiving facilities;
8. Coding all claims for reimbursement properly;
9. Avoiding inappropriate balance billing in violation of any applicable mandatory assignment rules
10. Avoiding billing Medicare an amount "substantially in excess" of the usual charges for services in accordance with regulations
11. Proper and prompt resolution of overpayments received for claims that have been submitted for reimbursement
12. Applying proper safeguards for the security and protection of confidential patient information;
13. Providing physical and technical integrity of all computer and systems and data entry devices;
14. Ensuring that computer software programs that have certain "defaults" are turned off or carefully monitored to avoid inaccurate claim submission (Example: a software default that permits personnel to enter data in fields indicating services were rendered though not actually performed or documented, or a default that automatically indicates the patient was bed-confined);
15. Ensuring that all personnel maintain the confidentiality of patient information and patient records in accordance with the HIPAA Privacy Regulations and state law;
16. Ensuring the security of provider identification numbers (such as the service's Medicare provider number and patient identification numbers) and preventing misuse of identification numbers which can result in improper billing;
17. Ensuring there is a process in place to avoid duplicate billing ;

BUSINESS CODE OF CONDUCT & ETHICS continued

18. Proper use of billing modifiers by billing office
19. Ensuring that there is a process in place to prevent the payment of incentives or anything else of value in return for influencing the referral of ambulance services to MetroAtlanta Ambulance in violation of the federal anti-kickback statute (AKS) or other similar Federal or State statute or regulation;
20. Making only appropriate arrangements with hospitals and nursing facilities, including contracts with facilities to provide medical transportation based on the fair market value of the services provided;
21. Establishing properly constructed joint ventures with other ambulance services and providers;
22. Making sure that arrangements with patients do not or cannot be inferred to improperly cause a patient to choose a particular ambulance service
23. Properly collecting any co-payments and deductibles that the patient is normally required to pay, unless permitted by properly structured ambulance membership/subscription programs or municipal contracts
24. Establishing consistent internal billing and coding
25. Properly amending and correcting Patient Care Reports (PCRs) and other documents so that there is no misrepresentation of any information contained in the documentation;
26. Billing for services only when there is proper documentation of the service
27. Billing for services only when those services are provided by the appropriately certified personnel and in licensed ambulances, in accordance with state law
28. Ensuring that all necessary documentation (call intake records, dispatch records, patient care report, etc.) are available at the time of the preparation of the claim for submission
29. Employing or contracting only with individuals or other entities that have not been excluded from participation in federal health care programs under the Office of Inspector General's exclusionary authority.

All these areas have been covered in your training. The Compliance Officer should be consulted if questions arise or to report a potential violation or any compliance concern relating to any of these key areas you witness or have knowledge of.

My signature below attest my acknowledgment that I have read WayPoint and understand MetroAtlanta Ambulance's Code of Business Conduct and Ethics, Compliance Codes of Conduct and that MetroAtlanta Ambulance is committed to conducting its operations in a lawful and ethical manner. I also agree to abide by these codes of conduct in the performance of my duties.

Employee Name (Print)

Date

Signature

ACKNOWLEDGEMENT Confidentiality and Security Agreement

I _____ (**Print Name**) understand that the Metro Atlanta Ambulance Service (the “Company”) for which I work, consult or provide services, manages health information as part of its mission to treat patients. Further, I understand that the Company has a legal and ethical responsibility to safeguard the privacy of all patients and to protect the confidentiality of their patients’ health information. Additionally, the Company must assure the confidentiality of its human resources, payroll, fiscal, research, internal reporting, strategic planning information, or any information that contains Social Security numbers, health insurance claim numbers, passwords, PINs, encryption keys, credit card or other financial account numbers (collectively, with patient identifiable health information, “Confidential Information”). In the course of my employment/assignment at the Company, I understand that I may come into the possession of this type of Confidential Information. I will access and use this information only when it is necessary to perform my job related duties in accordance with the Business Code of Conduct & Ethics Policies, which are available electronically. I further understand that I must sign and comply with this Agreement in order to obtain authorization for access to Confidential Information or Company systems.

☐ General Rules

1. I will act in the best interest of the Company and in accordance with its Code of Conduct at all times during my relationship with the Company.
2. I understand that I should have no expectation of privacy when using Company information systems. The Company may log, access, review, and otherwise utilize information stored on or passing through its systems, including email, in order to manage systems and enforce security.
3. I understand that violation of this Agreement may result in disciplinary action, up to and including termination of employment, suspension, and loss of privileges, and/or termination of authorization to work within the Company, in accordance with the Company’s policies.

☐ Protecting Confidential Information

1. I will not disclose or discuss any Confidential Information or Company strategic plans with others, including friends or family, who do not have a need to know it. I will not take media or documents containing Confidential Information home with me unless specifically authorized to do so as part of my job.
2. I will not publish or disclose any Confidential Information to others using personal email, or to any Internet sites, or through Internet blogs or sites such as Facebook, Twitter, Instagram, Snap Chat, YouTube, etc. I will only use such communication methods when explicitly authorized to do so in support of Company business and within the permitted uses of Confidential Information as governed by regulations such as HIPAA.
3. I will not in any way divulge, copy, release, sell, loan, alter, or destroy any Confidential Information except as properly authorized. I will only reuse or destroy media in accordance with Company Information Security Standards and Company record retention policy.
4. In the course of treating patients or assisting with their business accounts, I may need to orally communicate health information to or about patients. I will take reasonable safeguards to protect conversations from unauthorized listeners. Such safeguards include, but are not limited to: lowering my voice or using private rooms or areas where available.
5. I will not make any unauthorized transmissions, inquiries, modifications, or purgings of Confidential Information.
6. I will not transmit Confidential Information outside the Company network unless I am specifically authorized to do so as part of my job responsibilities. If I do transmit Confidential Information outside of the Company using email or other electronic communication methods, I will ensure that the Information is encrypted according to Company Information Security Standards.

☐ Following Appropriate Access

1. I will only access or use systems or devices I am officially authorized to access, and will not demonstrate the operation or function of systems or devices to unauthorized individuals.
2. I will only access software systems to review patient records or Company information when I have a business need to know, as well as any necessary consent. By accessing a patient’s record or Company information, I am affirmatively representing to the Company at the time of each access that I have the requisite business need to know and appropriate consent, and the Company may rely on that representation in granting such access to me.

Using Portable Devices and Removable Media

1. I will not copy or store Confidential Information on removable media or portable devices such as laptops, personal digital assistants (PDAs), cell phones, CDs, thumb drives, external hard drives, etc., unless specifically required to do so by my job. If I do copy or store Confidential Information on removable media, I will encrypt the information while it is on the media according to Company Information Security Standards
2. I understand that any mobile device (Smart phone, PDA, etc.) that synchronizes company data (e.g., Company email) may contain Confidential Information and as a result, must be protected. Because of this, I understand and agree that the Company has the right to:
 - a. Require the use of only encryption capable devices.
 - b. Prohibit data synchronization to devices that are not encryption capable or do not support the required security controls.
 - c. Implement encryption and apply other necessary security controls (such as an access PIN and automatic locking) on any mobile device that synchronizes company data regardless of it being a Company or personally owned device.
 - d. Remotely "wipe" any synchronized device that: has been lost, stolen or belongs to a terminated employee or affiliated partner.
 - e. Restrict access to any mobile application that poses a security risk to the Company network.

Doing My Part – Personal Security

1. I understand that I will be assigned a unique identifier to track my access and use of Confidential Information and that the identifier is associated with my personal data provided as part of the initial and/or periodic credentialing and/or employment verification processes.
2. I will:
 - a. Use only my officially assigned User-ID and password.
 - b. Use only approved licensed software.
 - c. Use a device with virus protection software.
3. I will never:
 - a. Disclose passwords, PINs, or access codes.
 - b. Use tools or techniques to break/exploit security measures.
 - c. Connect unauthorized systems or devices to the Company network.
4. I will practice good workstation security measures such as using screen savers with activated passwords, positioning screens away from public view and logging off when not in use.
5. I will immediately notify my Supervisor and/or IT help desk if:
 - a. my password has been seen, disclosed, or otherwise compromised;
 - b. I suspect a virus infection on any system;
 - c. I am aware of any activity that violates this agreement, privacy and security policies; or
 - d. I am aware of any other incident that could possibly have any adverse impact on Confidential Information or Company systems.

Upon Termination

1. I agree that my obligations under this Agreement will continue after termination of my employment, expiration of my contract, or my relationship ceases with the Company.
2. Upon termination, I will immediately return any documents or media containing Confidential Information to the Company.
3. I understand that I have no right to any ownership interest in any Confidential Information accessed or created by me during and in the scope of my relationship with the Company.

By signing this document, I acknowledge that I have read this Agreement and I agree to comply with all the terms and conditions stated above.

Print Name

Date

Signature

Witness Signature

MetroAtlanta

Ambulance Service



“Providing Excellence in Patient Care and Customer Service”



Metro Atlanta Ambulance Service
Code of Business Conduct and Ethics
Ethics & Compliance Hotline 770.693-8432

1120 Allgood Industrial Court
Marietta, Georgia 30066
