



Policy Title: Business Ethics and Code of Conduct	Policy Date: 07/01/2019 Review Date: 06/25/2020 Revision Date:	Department: Compliance Approved By: Compliance Officer
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Business Ethics and Code of Conduct in the workplace.

Since its foundation in 1998, LCP Transportation, LLC has built an honorable reputation and an exceptional culture through the hard work and integrity of its employees. We have achieved significant growth and success by upholding this reputation and acting with the highest values and principles. We will continue to succeed if we all work to understand the values contained in this Business Ethics and Code of Conduct and direct our individual behavior by them.

This guide was established to shape, illustrate, and defend the values that each employee is expected to uphold. The purpose of this guide is to help you choose wisely when you represent LCP Transportation, LLC, and its subsidiaries to others, as well as when dealing with your fellow workers. Every decision you make and every action you take can affect employee morale, the perception of our company, and the sustainable results we achieve.

Our commitment to compliance is absolute. It is one of the company's most fundamental principles. At LCP Transportation, LLC, compliance is everyone's responsibility. We must all be willing to speak up. The company maintains a zero-tolerance policy for anyone who knows about a potential violation and fails to report it.



Purpose, Mission, and Values

At LCP Transportation, LLC, our Purpose, Mission, and Values act as the foundation of our business conduct and daily operations.

OUR PURPOSE

Transforming the health of the community, one person at a time.

OUR MISSION

The LCP Transportation family strives to be the leader in transportation to ensure medical care is assessable to the community we serve.

OUR VALUES

At LCP Transportation, LLC six core values act as the foundation of our business conduct and daily operations:

- ***Uncompromising Integrity:*** We adhere to the strict moral and ethical LCP Transportation, LLC Business Ethics and Code of Conduct, without exception. We know that our future depends entirely on our reputation.
- ***Collaborative Leadership:*** We are committed to an organizational culture that inspires all team members to flourish in the achievement of value-driven goals and opportunities for continuous development.
- ***Candid Communication:*** We value diversity and trust in all aspects of our business. This is built through appropriate disclosure, honesty, and consideration in all forms of communication and at every level.
- ***Disciplined Growth:*** We will achieve our Vision through clear and consistent decision-making and strategies that produce reliable results for our customers and their members.
- ***Purposeful Innovation:*** We will always look for, find, and implement unique solutions that improve our business.
- ***Entrepreneurial Spirit:*** We embrace the drive, creativity, and open-mindedness of our people. We empower all individuals in the organization to take ownership of the business, at all levels.



Policy Statement

The following Business Ethics and Code of Conduct applies to all persons employed by LCP Transportation, LLC, and each of its contracted subcontractors/vendors.

It is the policy of the Company to conduct its business affairs in accordance with the standards and rules of ethical business conduct and to abide by applicable laws, both in letter and spirit. In this, there is no room for compromise.

General Policy

All management and employees of LCP Transportation, LLC must comply with the standards contained in the Business Ethics and Code of Conduct, immediately report any perceived violations, and assist in investigating any allegations of wrongdoing. It is the policy of the Company to prevent the occurrence of unethical or unlawful behavior, to halt such behavior as soon as reasonably possible after its discovery, and to discipline management or employees who violate the standards contained in the Code. This includes any individuals who fail to report a known violation.

All employees, as a condition of their employment, will be asked to complete and sign acknowledging receipt and understanding of this Business Ethics and Business Ethics and Code of Conduct. Also, Management, and employees will be required to complete a Conflict-of-Interest Disclosure annually.

Individuals who violate this Business Ethics and Code of Conduct may be subject to disciplinary action up to and including termination. In addition, the employee or former employee in violation may be the subject of civil liability and criminal prosecution under applicable law. Furthermore, any employee who authorizes or knowingly permits another employee to engage in a violation of this Business Ethics and Code of Conduct may also be subject to disciplinary action and dismissal.

Employee Rights & Responsibilities

Every employee is obligated to adhere to this Business Ethics and Code of Conduct strictly always and under all circumstances.

Any employee who is aware of violations or potential violations must immediately advise his or her supervisor, the Compliance Officer, or management of the Company. If an investigation determines that an employee had knowledge of a policy violation, misconduct, or issue of non-compliance and did not report the issue, that employee may be subject to disciplinary action up to and including termination. If an employee has any uncertainty regarding legal or ethical issues involving Company affairs, the employee should seek advice or clarification from his or her supervisor, the Compliance Officer, or the Human Resource Department. The failure to seek advice or report Business Ethics and Code of Conduct violations could be detrimental to the individual and the Company. Each employee should be aware that legal implications arising from any act, written record, correspondence, or other document created or maintained by an employee may be subject to future scrutiny by government officials or third parties.

It is the right of every employee to report to, make an inquiry of, or ask the advice of their supervisor or management of the Company, regarding any possible violation of this Business Ethics and Code of Conduct, without risk to the employee's job status or position. To secure this right, each person to



whom a report is made or from whom advice is sought shall use every reasonable means available to keep the identity of any employee who requests such protection confidential. Confidentiality may be waived if the matter is turned over to law enforcement or part of a legal proceeding.

Ethics

It is the policy of the Company to observe all applicable laws. Even where the law is permissive, the Company shall choose the course of the highest integrity. Local customs and traditions differ from place to place. Honesty and integrity, however, are cornerstones of good business in any culture. A well-founded reputation for scrupulous dealings is an invaluable asset. All management and employees must understand that at LCP Transportation, LLC, we care how results are obtained, not just that they are obtained. Management and employees must be always honest and forthcoming, even when it is awkward or uncomfortable.

Antitrust & Competition

Competition is valuable because it brings out the best in a person, a company, or an industry. Even when we are competing, we hold ourselves to the highest standard of uncompromising integrity.

Antitrust law is extremely complex and covers a broad range of conduct that may be illegal. In general, antitrust law prohibits making agreements or sharing information with competitors regarding:

- Competitive bids or quotes
- Purchasing costs or terms
- Selling prices or pricing policies
- Credit information
- Customers or account data
- Product plans
- Profits or profit margins

As a rule, we never discuss these subjects with a competitor. Always use extreme care when speaking with a competitor or when answering questions from regulatory agencies or outside attorneys.

LCP Transportation, LLC is committed to being fair, honest, and accountable. We compete based on our superior services, and employees. The Company should never compete by using unlawful measures intended to harm another company or to force it from a market.

Financial Records & Controls

LCP Transportation, LLC is committed to encouraging candid communication and transparency by keeping complete and accurate records and implementing appropriate controls. This commitment includes general business and financial records. Accurate documentation should always be a priority. No employee should enter any transaction with the understanding that it is anything other than what is described in the agreement and supporting documentation.

All transactions must be transparent and properly recorded. There must be no disbursement or receipt of corporate funds outside the Company's system of accountability.



Our records must be complete and accurate, fully reflecting the company's activities and transactions, including claim payments, billing documentation, expenses, purchases, accounts receivable.

It is difficult to delineate every practice that is or is not permissible, but certain general guidelines can be set forth. For example, a payment is prohibited if:

- It is illegal.
- It is inconsistent with LCP Transportation LLC's defined values.
- No record of its disbursement or receipt is entered into the accounting records of the company.
- It is entered into the accounting records of the company in a manner that is false or misleading.

Fraud, Waste, and Abuse

Honesty means communicating candidly and truthfully in all our business relationships and transactions. While anyone can make an honest mistake, fraud is different. Fraud is not a mistake. Fraud involves deliberate deception. Fraud is not only unethical, but it is also illegal. Examples of fraud include:

- Falsifying information
- Submitting false expense reports
- Misappropriating assets or misusing LCP property
- Forging or altering documentation
- Improperly changing Company records or financial statements

The FWA Program is designed to prevent and reduce fraud, waste, and abuse among providers, members, employees, and subcontractors. It may also help to prevent potential health risks to members. A toll-free Fraud and Abuse Hotline is available to U.S. employees, members, patients, business partners, and network providers: 1-866-685-8664.

The U.S. False Claims Act

Under the U.S. False Claims Act (FCA), any individual or entity that knowingly keeps an overpayment or submits a false or fraudulent claim for payment of U.S. Government funds can be held liable for significant penalties and fines. The FCA applies to claims by health care organizations to Medicaid, Medicare, and other government-sponsored health care programs. Potential fines for violating the FCA include a penalty of: (1) up to three times the amount of the damages sustained by the government for each false claim; (2) additional civil penalties for each false claim; and (3) payment of the cost of the civil action by the entity or individual that submitted the false claims. Criminal penalties may also apply. If found liable under the FCA, the entity or individual may also be excluded or suspended from participating in all federal health care programs. The FCA contains "whistleblower provisions" that allow people with evidence of fraud against the government to sue, on behalf of the U.S. Government, to recover the stolen funds. In some cases, the U.S. Government may join the whistleblower suit. If a whistleblower suit is ultimately successful, the person who initially brought the suit may be awarded a percentage of the recovered funds. The FCA also contains a provision that protects the whistleblower from retaliation by their employer. This provision applies to any employee who is discharged, demoted, suspended, threatened, harassed, or discriminated against because of the employee's lawful acts in a whistleblower suit. LCP affords employees all protections required by the FCA. In addition to the U.S.



FCA, several U.S. states and other countries also have false claims legislation with similar penalties that work to discourage fraud perpetrated against local governments.

Potential violations of the U.S. False Claims Act include:

- Billing for goods and services that were never delivered or rendered.
- Submitting false service records or reports to show better than actual performance.
- Unbundling - Using multiple billing codes instead of one billing code to increase reimbursement.
- Double billing - Charging more than once for the same goods or services.
- Phantom employees and falsified timesheets - Charging for employees that were not actually on the job, or billing for made-up hours to maximize reimbursements.
- Being overpaid by the government for sale of a good or service, and not reporting and returning that overpayment
- False certification that a contract falls within certain guidelines (e.g., the contractor is a minority or veteran)
- Winning a contract through kickbacks or bribes

Protecting Confidential Information

LCP is committed to being conscientious and accountable when handling confidential Company information. Business, health, and financial information is considered confidential and therefore must be:

- Protected by an effective internal control environment, including policies and procedures to secure the Company's assets.

Certain kinds of business and financial information are crucial to LCP's success. Knowledge and information of this sort are referred to as "proprietary" or "trade secrets" because they belong to LCP rather than to any individuals or groups within or outside the Company. This information is what separates us from our competitors. The health information of our employees and those we serve is personal, private, and protected by law. For this reason, the information must be safeguarded by all employees. Protecting the Company's information assets is everyone's responsibility. Examples of this type of confidential information include:

- Health information of employees and those we serve.
- Company financial information, including financial statements, accounts payable summaries, vendor listings, and price/cost information.
- Written agreements between LCP and agents, strategic partners, vendors, and/or other third parties Company computer systems and technology
- Customer lists and agreements, market share data, and strategic plans
- Policies, procedures, and processes reveal the way we do business and compete with other businesses.

Any work product conceived, created, or changed by employees, individually or jointly, during the period of employment belongs to the Company. This includes writings, models, processes, technologies, inventions, discoveries, ideas, and other work products of any nature. Employees may not share,



publish, claim, or further develop any Company work product during or after their employment unless they have express, written permission to do so from the Corporate Legal Department.

LCP respects the intellectual property of others, including suppliers, vendors, business partners, providers, and competitors. Employees are expected to comply with applicable licensing, and rental agreements and may not make unauthorized copies of software or any other copyrighted material.

Some laws and regulations govern how we maintain Company records, including business, financial, employee, and member records. Management and employees are responsible for ensuring that Company records are retained and disposed of in accordance with all applicable laws, regulations, and the Company's record management policies. Records include information stored in various media, including paper, electronic, audio, or video. The record retention time frame is ten years. Management and employees are responsible for understanding the record retention schedule for our records. Never alter or destroy any records.

Information security at LCP is everyone's responsibility. Social engineering, malware, phishing, and other cyber or physical threats can compromise the integrity, confidentiality, and availability of Company systems and result in significant breaches of confidential information. As LCP's first line of defense against attacks, employees are essential to supporting LCP's culture of information security. LCP works to protect information assets through several technical, administrative, and physical controls intended to proactively address security incidents and reduce their potential impact. Examples of these controls include:

- Enabling multi-factor authentication to access Company systems.
- Providing employee resources and training to promote information security awareness and reduce security risk.
- Implementing automated tools for detecting and responding to threats
- Ensuring appropriate encryption technology is in place for the secure storage and exchange of confidential data.

To minimize information security risk and help secure the Company's information assets, it is the responsibility of every employee to adhere to the Company's information security policies.

The use of social media by employees, including information shared through instant messaging, texts, blogs, and social networking sites, can have a far-reaching and permanent impact on our Company. Because social media enables information to spread quickly, we must consider how social media has the potential to impact LCP's business, brand, and reputation. Employees are responsible for their content that is accessible through social media channels. When using social media for personal reasons, make it clear that you do not speak on behalf of the Company.

LCP is committed to respecting privacy and keeping important personal information confidential. We expect the same from employees when utilizing information technology tools such as e-mail and Internet access. LCP's Internet and e-mail systems are provided to help you do your job and should be used for business purposes. Business or personal messages, including any attached electronic files/content sent or received using e-mail, Internet/Intranet, instant messaging, telephone and voicemail systems, or other Company assets are property of LCP and, as such, remain subject to review by the



Company at any time. Lawfully monitoring and reviewing our electronic communications systems is necessary to meet our obligations to maintain member privacy, protect personal data, guard against data theft, and investigate reports of unlawful behavior. Additionally, in the event LCP becomes involved in litigation or an investigation, employee e-mails or Internet history may be turned over to third parties. You should never send an e-mail or other electronic communications that you would not write in a printed document. Your work, whether it consists of e-mail, paperwork, computer files, products, customer calls, or other interactions, belongs to LCP. All this work is subject to review, where permitted by law. Additionally, business equipment, including computers, desks, and file cabinets, belongs to LCP and is also subject to search or investigation for business and security reasons.

LCP is committed to maintaining and promoting a diverse and inclusive environment. We know that having a workforce reflecting the communities we serve and the communities we will serve in the future is the key to growth and innovation. Diversity and inclusion are a core value that is reflected not only in our workforce, but also in our engagements with the communities we serve, our suppliers and vendors, our providers, and our business partners. For purposes of this Business Ethics Code of Conduct, harassment includes any such verbal or physical conduct intended to threaten, intimidate, or coerce any employee, co-worker, or any person working for or on behalf of the Company. The Company prohibits harassment and discrimination of any individual based on the person's age, race, color, religious creed (including religious dress and grooming practices), national origin or ancestry, mental and physical disability (including HIV and AIDS), medical condition (including cancer), sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), sexual orientation, gender, gender identity and gender expression, marital status, military and veteran status, uniform service member status, genetic information, request for Pregnancy, Disability, Family Care, or Medical Leave, or any other legally protected status under applicable law. Further, it is the policy of the Company to provide all employees and candidates for employment with opportunities based solely upon their talents, skills, and abilities.

LCP is committed to protecting the safety, health, and well-being of all employees and individuals in our workplace. This includes maintaining an environment that is free from intimidation and acts or threats of violence. All employees are expected to comply and should help maintain a safe work environment by promptly reporting any threatening or violent conduct. Also, LCP maintains an alcohol and drug-free atmosphere focused on preventing risk to our employees, the members we serve, and members of the public who may interact with our business.

LCP recognizes the importance of community engagement. Employees are encouraged to engage with the communities they serve by building and maintaining relationships with local community organizations. Employees should not participate in community engagement volunteer activities on behalf or as representatives of the Company without prior consent from Management.



Business Ethics and Code of Conduct Policy Acknowledgment Statement

Today's Date: ____/____/____

With my signature below, I acknowledge that I have received, read, and understand the Business Ethics and Code of Conduct Policy.

I understand I must abide by the Business Ethics and Code of Conduct Policy and I understand that I am an employee at will.

Company Name: _____

Employee Signature : _____