



Policy – Code of Conduct for Providers/Drivers

The successful business operation and reputation of WellTrans is built upon principles of fair dealing and ethical conduct of our Providers and drivers. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of WellTrans is dependent upon our customers' trust and we are dedicated to preserving that trust. Providers and drivers owe a duty to WellTrans and its customers to act in a way that will merit the continued trust and confidence of the public.

WellTrans will comply with all applicable laws and regulations and expects Providers, drivers, and contractors to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

Requirements of each Provider:

- Providers/Drivers must conform to all laws that apply to business of WellTrans wherever it is conducted.
- Providers/Drivers will conduct activities with integrity and honesty.
- Providers/Drivers must display good judgment and high ethical standards in business dealings. All WellTrans business affairs must be conducted with honesty, fairness and integrity. These qualities are evidenced by truthfulness and the absence of deception or fraud. It is important to understand the legal and ethical position of WellTrans and its Providers/drivers to avoid concerns regarding fraud and abuse arrangements or practices.
- Providers/Drivers must not knowingly create, maintain or submit records, reports or statements that are inaccurate, false or misleading. No undisclosed or unrecorded funds or assets can be established. All items of income and expense and all assets and liabilities must be entered in the financial records and must be accurately and adequately described. All reports submitted to governmental authorities must be accurate and complete and all transactions shall be executed in accordance with management's authorization.
- All confidential information will not be disclosed to unauthorized people. Providers/Drivers will not use confidential information in a way that is not related to WellTrans business activities during or after their services. Confidential information cannot be given to competitors, suppliers, or contractors or to other individuals who do not have a legitimate need to know.
- Providers/Drivers must not participate in activities that could conflict or appear to conflict with their responsibilities to WellTrans. Providers/Drivers may not realize any profit or gain as a result of their position with WellTrans other than normal compensation from WellTrans. A conflict of interest occurs if their activities or responsibilities are detrimental to the interest of WellTrans or result in improper or illegal personal gain.
- It is the duty of all Providers/drivers of WellTrans to report any suspicious, illegal, or unethical activities or possible conflicts of interest of themselves, employees, contractors, agents and of others to the WellTrans Provider Relations Specialist.
- It is the duty of all Providers/drivers to self-report any conviction of, or charged with, a criminal offense related to health care, or if they have been listed by a federal agency as debarred, excluded or otherwise ineligible for participation in federally funded health programs.
- It is the duty of all Providers/drivers of WellTrans to complete the company's Compliance and Fraud, Waste & Abuse training annually. New employees, officers, board or committee members



must complete such training within 90 days of initial hire or appointment.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your Provider Relations Specialist and, if necessary, with the Program Manager for advice and consultation.

WellTrans ensures that Providers/drivers may report or assist in investigation of suspected illegal acts or improper conduct without threat of negative consequences.

- No retaliation, reprisals or disciplinary action will be taken or permitted against WellTrans Providers for good faith participation in the Compliance Program, including but not limited to reporting potential issues to appropriate authorities, cooperating in the investigation of suspected illegal activities or improper conduct, and conducting self-evaluations, audits and remedial actions.
- Failure to abide by this prohibition against retaliation or reprisals is a violation of this Code of Conduct and may be a violation of Federal and/or State law, i.e. False Claims Act.

Compliance with this policy of business ethics and conduct is the responsibility of every WellTrans Provider/driver. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of partnership.

Each Provider/driver is required to read and acknowledge this Code of Conduct on an annual basis by way of the certification statement below.

I hereby certify that:

I have read, understand and agree to abide by WellTrans Code of Conduct.

I have not been convicted of, or charged with, a criminal offense related to health care, nor have I been listed by a federal agency as debarred, excluded or otherwise ineligible for participation in federally funded health programs.

I agree to report suspected violations of any Federal and/or State laws, regulation, the Code of Conduct or the FWA Plan to the Provider Relations Specialist or Program Manager. I understand that any violation of any Federal and/or State laws, regulations, the Code of Conduct, the FWA Plan or any other WellTrans compliance policy or procedure is grounds for disciplinary action, up to and including termination of partnership.

Unless otherwise noted in the space immediately below, I am not aware of any possible violations of any Federal and/or State laws, regulation, the Code of Conduct or the Anti-Fraud Plan at this time.

PROVIDER/DRIVER NAME: (printed) _____

PROVIDER/DRIVER SIGNATURE: _____

DATE: _____