



Code of Conduct

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“To serve our communities’ pre-hospital needs through value-driven, compassionate, and clinically superior care.”

Contents

OVERVIEW AND PURPOSE	4
Overview	4
Guiding Principles.....	4
Purpose	4
MISSION, VISION, VALUES	5
INTRODUCTION	5
1 Confidentiality.....	6
1.1 Patient Information	6
1.2 Personnel Information	6
1.3 Proprietary Information	6
2 Legal Compliance	6
2.1 Antitrust	7
2.2 Environmental	7
2.3 Discrimination	7
2.4 Health and Safety	8
3 Fraud and Abuse	8
4 Business Ethics.....	8
4.1 Honest Communication	8
4.2 Misappropriation of Proprietary Information	9
4.3 Grant Funding	9
5 Political Activities	9
5.1 Political Contributions	9
6 Charitable Contributions	9
7 Conflicts of Interest	10
7.1 Outside Financial Interests	10
7.2 Services for Competitors/Vendors	10
7.3 Participation on Boards of Directors/Trustees	10
7.4 Honoraria	11
8 Business Relationships.....	11
8.1 Acceptance of Gifts and Favors	11
8.2 Workshops, Seminars, and Training Sessions.....	12
8.3 Contracting.....	12
8.4 Business Inducements.....	12
9 Protection of Assets.....	12
9.1 Internal Control	12

9.2 Financial Reporting.....13

9.3 Accuracy, Retention and Disposal of Document and Records13

9.4 Travel.....13

9.5 Personal Use of Corporate Assets13

9.6 Electronic Media.....13

10 Social Media and Social Networking.....14

ADMINISTRATION AND APPLICATION OF CODE OF CONDUCT14

OFFICER, DIRECTOR, AND TEAM MEMBER PARTICIPATION AND REPORTING.....15

 Examples of What to Report15

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Code of Conduct

This Workplace Code of Conduct (“Code”) provides sensible advice about the principles and expectations for professional conduct and ethical behavior for all employees of EMSA. By adhering to this Code, we foster a positive, inclusive, and respectful work environment that aligns with our core values and organizational objectives.

Code of Conduct Overview and Purpose

Overview

EMSA is committed to serving our communities’ pre-hospital needs through values-driven, compassionate, and clinically superior care. EMSA’s Code of Conduct supports this commitment. It is our ethical compass and represents our core values. Refer to this Code of Conduct to guide you in your daily work. Use it when you need guidance on appropriate action or when your instincts tell you something doesn’t feel quite right.

Compliance is everyone’s responsibility. EMSA is committed to complying with all applicable laws and regulations and demonstrating high ethical standards in everything we do. The Code of Conduct contains principles articulating the policies of EMSA and standards which are intended to provide additional guidance to anyone who works for or on behalf of EMSA. This includes all Team Members (including Officers, Directors, and Board of Trustees), temporary employees, contingent workers, volunteers, members of the Board of Trustees, independent contractors, vendors, and consultants are expected to read, understand, and adhere to our Code of Conduct. Contractors and temporary staff are also expected to adhere to this Code while working for or on behalf of the company.

Guiding Principles

These guiding principles set forth EMSA’s expectation for our behavior, consistent with the ethical and legal standards that help us to protect lives and livelihoods of our Officers, Directors, Board of Trustees, and Team Members (representatives). The Code cannot address every situation that we may encounter in our daily activities, but that does not take away the responsibility to always do what’s right. When we are not sure of what is the right thing to do, the Code provides guidance and resources to assist us in knowing what to do. We must always follow the spirit of the Code as well and the letter of the law.

When faced with a difficult decision or situation, to help us determine the right thing to do, we should ask ourselves the following questions before acting:

- Are my actions consistent with EMSA’s Values?
- Am I treating others the way I would like to be treated?
- Am I acting with honesty and integrity?
- Do my actions meet the letter and the spirit of applicable laws?
- Are my actions in compliance with EMSA’s policies and procedures?
- Are my actions in EMSA’s best interests?
- What would my supervisors, co-workers, family, and friends think of my actions?
- How would my actions look in the headline of a newspaper or sound to a jury?
- If this becomes public knowledge, will I still feel I have done the right thing?

Purpose

This Code of Conduct (Code of Conduct) has been adopted by the Board of Trustees of the EMERGENCY MEDICAL SERVICES AUTHORITY (EMSA) to provide standards by which Officers, Directors, Board of Trustees, and Team Members (representatives) of EMSA will conduct themselves

to protect and promote organization-wide integrity and to enhance the ability of EMSA to achieve the organization's mission. The Code of Conduct:

- It is our organization's ethical compass.
- It represents our workplace values.
- It guides our work and our interactions with others.
- It is a resource to look to when you wonder, "What's the right thing to do?"

As you read, ask questions, and use the Code of Conduct in your daily work, please know that these resources are here for you and your Team Members. If you encounter any situations in your work that aren't addressed by the Code of Conduct, consult applicable policies, or talk to any of the following:

- To the AlertLine (877) 874-8416 (The AlertLine guarantees anonymity.)
- To the AlertLine website at <https://emsa.alertline.com/gcs/welcome>. (This website guarantees anonymity.)
- You may contact your immediate supervisor.
- By sending a confidential email to Compliance at emsacompliance@emsa.net
- You may contact the Revenue Integrity & Compliance Manager, at (918) 596-3028
- By sending a confidential email to Human Resources at hr@emsa.net

Mission, Vision, Values

Mission

To serve our communities' pre-hospital needs through values-driven, compassionate, and clinically superior care. Oklahoma residents can take comfort in knowing that a diverse team of dedicated healthcare providers – including paramedics, emergency medical technicians, specially-trained medical dispatchers, and others – stand ready to respond to your emergency medical needs.

Vision

We provide exceptional service through organizational teamwork to promote an innovative, responsive, and professional Authority that adapts within a changing environment. By utilizing collaborative working relationships, our vision is to be the standard of excellence in Emergency Medical Service. We are a healthcare organization with the single purpose of serving the greater community good.

Values

Patient Centered
Team Focused
Fiscally Responsible
Highly Accountable

Introduction

Employees are expected to conduct themselves in a professional manner. This includes punctuality, reliability, and commitment to delivering high-quality work. This Code of Conduct contains Ten Key Principles articulating EMSA's policies and standards which are intended to shape, define, and drive our culture of compliance. As required by law, the Code of Conduct shall be provided to all new Team Members and will also be periodically redistributed to existing Team Members, members of the Medical Director's staff and the Medical Control Board, all independent contractors, vendors, consultants, and agents of EMSA, and the EMSA Board of Trustees. All Team Members are responsible to ensure that their behavior and activity is consistent with the Code of Conduct.

As used in this Code of Conduct, the term EMSA means EMERGENCY MEDICAL SERVICES AUTHORITY and each of its divisions, subsidiaries and operating or business units. The terms “Officer”, “Director” and “Team Member” include any person who fills such a role or provides services on behalf of EMSA or any of its divisions, subsidiaries, or operating or business units. The term “supervisor” shall mean the immediate supervisor of an EMSA Team Member as assigned by the President and Chief Executive Officer (CEO), including the Organization’s Officers or Directors. For the CEO, the term “supervisor” shall mean the Chair of the Board of Trustees of EMSA. The term “representative” refers to the Officers, Directors, Board of Trustees and Team Members.

1. Confidentiality

EMSA and its representatives have access to a wide variety of confidential and sensitive information, the inappropriate release of which could be injurious to individuals, EMSA’s business partners and EMSA itself. Every EMSA representative must actively protect and safeguard confidential and sensitive information in a manner designed to prevent the unauthorized use or disclosure of such information. Failure to do so may result in:

- Disciplinary action up to and including termination of employment
- Criminal prosecution by state attorneys general or U.S. attorneys
- Sanctions imposed by regulatory bodies
- Disclosure/reporting to and/or discipline by applicable licensing board(s)
- Personal fines

EMSA is a public trust, and as such, certain information may be subject to disclosure under the Oklahoma Open Records Act, Okla. Stat. tit.51 §24A.1 et seq. Any requests pursuant to the Open Records Act should be directed to the CEO and Revenue Integrity & Compliance Manager.

1.1 Patient Information

The treatment of patient information will be done in accordance with EMSA’s policies and procedures related to compliance with HIPAA privacy rules and regulations. These can be obtained from EMSA’s Revenue Integrity & Compliance Manager.

1.2 Personnel Information

Payroll information other than gross salary, benefits, and other personal information about an Officer, Director, or Team Member shall be confidential. All Officers, Directors, or Team Members personnel files, payroll information, disciplinary matters, and similar information which would constitute an unwarranted invasion of personal privacy shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Officers, Directors, or Team Members will exercise due care to prevent the release or sharing of information beyond those who may need such information to fulfill their job function.

1.3 Proprietary Information

EMSA’s information, ideas, and intellectual property assets are essential to its organizational success. Information about EMSA’s competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with an Officer, Director, Team Member or third parties should be protected to the extent allowed by law and shared only with representatives having a need to know such information to perform their duties with EMSA. EMSA’s Representatives should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights, and software, are carefully maintained, and managed to preserve and protect its value.

2. Legal Compliance

These Principles are intended to provide guidance to EMSA’s Representatives and assist them in complying with applicable laws. They are neither exclusive nor complete. EMSA’s Representatives must comply with all applicable laws, whether addressed explicitly in these Principles or not.

2.1 Antitrust

All EMSA's Representatives must comply with applicable antitrust and similar laws which regulate competition. Examples of conduct prohibited by the law include [1] agreements to fix prices, bid rigging, collusion (including price sharing) with competitors; [2] boycotts, specific exclusive dealing, and price discrimination agreements; and [3] unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation, and similar unfair practices.

2.2 Environmental

EMSA's policy is to manage and operate its business in the manner that respects our environment and conserves natural resources. EMSA's Representatives will strive to utilize resources appropriately and efficiently, recycle where possible and otherwise dispose of all waste per applicable laws and/or regulations. EMSA Representatives will work cooperatively with the appropriate authorities to remedy any environmental contamination for which EMSA may be responsible.

2.3 Discrimination

EMSA believes that the fair and equitable treatment of Officers, Directors, Team Members, patients, and other persons is critical to fulfilling its vision and goals.

EMSA does not exclude, deny benefits to, or otherwise discriminate against any person on the grounds of race, color, gender, religion, national origin, disability, age, genetic information, gender identity, sexual orientation, veteran's status, or any other basis protected by applicable federal, state, or local law in admission to, participation in, or receipt of the services and benefits under any of its programs, activities, and in staff assignments.

It is EMSA's policy to recruit, hire, train, promote, assign, transfer, layoff, recall and terminate Officers, Directors, or Team Members based on their own ability, achievement, experience and conduct without regard to race, color, religion, sex, ethnic origin, age, physical or mental disability, or any other classification prohibited by law.

No form of harassment or discrimination on the basis of sex (gender), gender identity, race, color, disability, age, religion, ethnic origin, disability, or any other classification prohibited by law will be permitted. Harassment that violates our policies can take many forms. A few examples include:

- Jokes, insults, threats, and inappropriate comments about a person's race, color, sex (gender), gender identity, age, religion, national origin, ancestry, citizenship, physical or mental disability, veteran status, sexual orientation, genetic information, or other status protected by federal, state, or local law.
- Unwelcome sexual advances, sexual remarks, displays of offensive material, request for sexual favors, and any other unwelcome verbal or physical conduct of a sexual nature.
- Verbal, physical, or visual conduct that disrupts another's work performance or creates an intimidating harassing, or hostile work environment.
- Communicating or displaying offensive material in the workplace.

Every allegation of harassment or discrimination is taken seriously and will be promptly investigated in accordance with applicable EMSA policies.

If you are the victim of discrimination in the workplace or hear it taking place, you should report it immediately to:

- To the AlertLine (877) 874-8416 (The AlertLine guarantees anonymity.)
- To the AlertLine website at <https://emsa.alertline.com/gcs/welcome>. (This website guarantees anonymity.)
- You may contact immediate supervisor

- By sending a confidential email to Compliance at compliance@emsa.net
- You may contact the Revenue Integrity & Compliance Manager, at (918) 596-3028
- By sending a confidential email to Human Resources at hr@emsa.net.

2.4 Health and Safety

EMSA complies with all government regulations and rules, EMSA policies, and required practices that promote the protection of workplace health and safety. EMSA's leaders are responsible for ensuring the right policies, procedures, systems, tools, equipment, and training have been developed to protect EMSA's Representatives from potential workplace hazards. Officers, Directors, or Team Members must become familiar with and understand how these policies apply to their specific job responsibilities and seek advice from their supervisor whenever they have a question or concern. It is essential that each Representative immediately advise his or her supervisor of any workplace hazard or injury or any situation presenting a danger of injury so that EMSA may implement corrective action to resolve the issue. Team Members can also notify the Risk and Occupational Health Department by email at riskandsafety@emsa.net

3. Fraud and Abuse

EMSA expects its Officers, Directors, or Team Members to refrain from conduct which may violate the fraud and abuse laws. These laws prohibit [1] direct, indirect or disguised payments in exchange for the referral of patients; [2] the submission of false, fraudulent or misleading claims to any governmental entity or third party payor, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or claims which do not otherwise comply with applicable program or contractual requirements; and [3] making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service.

EMSA has developed a comprehensive compliance program which details the responsibilities and obligations of all Officers, Directors, or Team Members regarding submissions for reimbursement to Medicare, Medicaid, and other government payors for services rendered by EMSA and any of its subsidiaries, divisions, or contractors. This compliance program conforms to applicable federal and state false claims laws and regulations, including detailed information about the Federal False Claims Act and Oklahoma False Claims Act.

In addition, EMSA has established policies, procedures, and systems to facilitate billing to non-government third-party payors and patients. These policies, procedures and systems conform to applicable federal and state laws and regulations.

4. Business Ethics

In furtherance of EMSA's commitment to the highest standards of business ethics and integrity, representatives will accurately and honestly represent EMSA and will not engage in any activity or scheme intended to defraud anyone of money, property, or honest services. This Principle is designed to provide guidance to ensure that EMSA's business activities reflect a high standard of business ethics and integrity. Representatives conduct not specifically addressed by other principles nevertheless must be consistent with Principle 4.

4.1 Honest Communication

EMSA requires openness and honesty from individuals in the performance of their duties and responsibilities, as well as in communication with our attorneys and auditors. No representative shall make false or misleading statements to any patient, person or entity doing business with EMSA about other patients, persons or entities doing business or competing with EMSA, or about the products or services of EMSA or its competitors. All communications with any third party regarding a patient should take into consideration Principle 5.1 below.

4.2 Misappropriation of Proprietary Information

EMSA's Representative shall not misappropriate confidential or proprietary information belonging to another person or entity nor utilize any publication, document, computer program, information, or product in violation of a third party's interest in such product. All EMSA's Representatives are responsible to ensure they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws or licensing agreements. Representatives shall not utilize confidential business information obtained from competitors [including lists of customers, price lists, contracts, or other information in violation of a covenant not to compete or a prior employment agreement] in a manner likely to provide an unfair competitive advantage to EMSA.

4.3 Grant Funding

From time to time, EMSA will receive grants from government or other agencies in association with EMSA. EMSA and its representatives will ensure adequate safeguards to ensure that an appearance of impropriety or actual impropriety is not created. EMSA and its representatives will ensure the money is being used in conformity with requirements of the grants.

5. Political Activities

EMSA and its representatives comply with all federal, state, and local laws governing participation in government relations and political activities. EMSA funds or resources are not contributed directly to individual political campaigns, political parties, or other organizations for political objectives.

5.1 Political Contributions

EMSA's Representatives cannot participate in or intervene in any political campaign on behalf of or in opposition to any candidate for public office, election, or ballot initiative on behalf of or in the name of EMSA.

Representatives are free to support any political party or entity on a personal level. However, those engaging in political campaigns are expected to do so as a private citizen and must always make clear that their views and actions are their own and not those of the company.

EMSA's Representatives must not use their position with EMSA to coerce or pressure Team Members in the organization to make contributions to support or oppose any political candidate, election, or ballot initiatives.

6. Charitable Contributions

It is the general policy of EMSA to not make charitable contributions. There are rare instances when an organization has a need that meets the intent to benefit the public and it is for a wholesome and benevolent purpose and the furtherance of public health and public purpose. EMSA and EMSA's Representatives will ensure that charitable contributions are appropriate under the Oklahoma Constitution and the Trust Indenture before any donation is authorized. In those instances, the gift must be reviewed by legal counsel, approved by the CEO, and approved by the Board of Trustees.

7. Conflicts of Interest

EMSA's Representatives owe a duty of undivided and unqualified loyalty to the organization. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in at the expense of the organization. Full disclosure of any situation in doubt should be made to permit an impartial objective determination. Disclosure relates to not only the Representative's activity, but also the activities of the Representative's household members.

All individuals subject to this Principle are expected to regulate their activities to avoid actual impropriety and/or the appearance of impropriety that might arise from the influence of those

activities on EMSA's business decisions. Specific conflict of interest policies can be found in EMSA's Bylaws and EMSA's Code of Conduct. All representatives are required to complete and submit a conflict of interest questionnaire disclosing all actual and apparent conflicts of interest biennially.

7.1 Outside Financial Interests

While not all inclusive, the following will serve as a guide to the types of activities by EMSA's Representatives or household members of an EMSA Representative that might cause conflicts of interest.

- If an EMSA Representative transacts business with another person or with another organization in which an immediate family member is an owner, Director, Officer, or key employee.
- Ownership in or employment by any outside concern which does business with EMSA. This does not apply to stock or other investments held in a publicly traded corporation, provided the value of the stock or other investments does not exceed 5% of the corporation's stock. EMSA may, following a review of relevant facts, permit ownership interests which exceed these amounts if management concludes such ownership interests will not adversely impact EMSA's business interest or the judgment of the representative.
- Representation of EMSA by a representative in any transaction in which they or a household member has a substantial personal interest.
- Disclosure or use of confidential, special or inside information of or about EMSA, particularly for personal profit or advantage of the representatives or a household member of such representatives.
- Competition with EMSA by EMSA representatives or a household member of such Representative, directly or indirectly, in the purchasing, selling, or owning property or property rights or interest, or business investment opportunities.

7.2 Services for Competitors/Vendors

All Officers, Directors, and Team Members that perform work or render services for any EMSA competitor or for any organization with which EMSA does business or which seeks to do business with EMSA outside of the normal course of his/her employment with EMSA without the written approval of EMSA's CEO and Revenue Integrity & Compliance Manager shall disclose all such relationships biennially when completing the conflict of interest questionnaire.

7.3 Participation on Boards of Directors/Trustees

All Officers, Directors, and Team Members must disclose in writing to their immediate supervisor, Revenue Integrity & Compliance Manager when serving on any board.

- An Officer, Director, or Team Member must obtain written approval from the CEO and the Revenue Integrity & Compliance Manager prior to serving as a member of the Board of Directors/Trustee of any organization whose interests may conflict with those of EMSA.
- An Officer, Director, or Team Member who is asked, or seeks to serve on the Board of Directors/Trustee of any organization whose interest would not impact EMSA (For example: civic [non-governmental], charitable, fraternal, and so forth will not be required to obtain such written approval.
- All fees/compensation (other than reimbursement for expenses arising from Board participation) that are received by an Officer, Director, or Team Member for Board services provided during normal work time, not including paid time off, shall be paid directly to EMSA.
- EMSA retains the right to prohibit membership for any Officer, Director, or Team Member on any Board of Directors/Trustees where such membership might conflict with best

interests of EMSA.

- Questions regarding whether Board participation might present a conflict of interest should be discussed with EMSA's Revenue Integrity & Compliance Manager.

7.4 Honoraria

Officers, Directors, or Team Members are, with the permission of their supervisor, encouraged to participate as faculty and speakers at educational programs and functions. You cannot accept honoraria, speaker's fees, or anything else of value from a vendor or educational programs in exchange for teaching or giving presentations prepared in the regular course of work on behalf of EMSA. For example, this includes payment for:

- Time
- Travel expenses
- Meals
- Entertainment
- Recreational or social activities

If you are offered an honorarium when presenting as a representative of EMSA, all honoraria shall be declined.

8. Business Relationships

Business transactions with vendors, contractors, and other third parties shall be transacted free from offers or solicitation of gifts, favors, or other improper inducements in exchange for influence or assistance in a transaction. This Principle is intended to guide representatives in determining the appropriateness of the listed activities or behaviors within the context of EMSA business relationships, including relationships with vendors, providers, contractors, third-party payors, and other government entities. It is EMSA's intent that this policy be construed broadly to avoid even the appearance of improper activity or impropriety. This Principle is like and includes Principle 7 regarding conflicts of interest; accordingly, representatives will be required to disclose all business relationships that may constitute an actual or apparent conflict of interest on an annual basis.

8.1 Acceptance of Gifts and Favors

- Gifts
It is EMSA's desire always to preserve and protect its reputation and to avoid the appearance of impropriety. Consequently, representatives may not accept a gift which values more than \$50.00 or solicit any gift or favor where the receipt would either compromise impartial performance or would be viewed by the public to compromise impartial performance. EMSA representatives may never accept cash or cash-equivalent gifts (for example, checks, gift certificates, gift cards, and coupons). Finally, under no circumstances may an EMSA representative solicit a gift of any kind. A representative shall document any gifts received and immediately notify the Revenue Integrity & Compliance Manager.
- Business Courtesies
EMSA recognizes there will be times when a current or potential business associate, vendor, or contractor, including a potential referral source, may extend an invitation to attend a social event to further develop a business relationship. An EMSA representative may accept such invitations, provided: (1) the cost associated with such an event is reasonable and appropriate, which, as a rule, means the cost will not exceed \$150.00 per person; (2) no expense is provided by the host for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging; and (3) such events are infrequent. The limitations of this section do not apply to business meetings at which food (including meals) may be provided.
- Meals and Entertainment
There may be times when an EMSA Executive wishes to extend to a current or potential business associate (other than someone who may be able to make a patient referral) an

invitation to attend a social event (e.g., reception, meal, sporting event, or theatrical event) to further or develop a business relationship. The purpose of the entertainment must never be to induce any favorable business action. During these events, topics of a business nature must be discussed, and the host must be present. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a rule, this means the cost will not exceed \$150.00 per person. Moreover, such business entertainment with respect to any individual must be infrequent, which, as a rule, means not more than three times per year. The organization will under no circumstances sanction any business entertainment that might be considered lavish or in questionable taste. Departures from the \$150.00 guideline are highly discouraged and must be approved by the CEO and Revenue Integrity & Compliance Manager.

8.2 Workshops, Seminars, and Training Sessions

Attendance at local, vendor sponsored workshops, seminars or training sessions is permitted. Attendance, at vendor expense (i.e., paid by vendor), at out of town seminars, workshops and training sessions is permitted only with the approval of the CEO and Revenue Integrity & Compliance Manager.

8.3 Contracting

EMSA representatives may not utilize “proprietary” information for any business activity conducted by or on behalf of EMSA. All business relations with contractors must be conducted at an arm’s length both in fact and in appearance and in compliance with EMSA’s policies and procedures. Officers, Directors, and Team Members must disclose personal relationships and business activities with a contractor which may be construed by an impartial observer as influencing the performance and duties of the Officer, Director, or Team Member. Officers, Directors, and Team Members have a responsibility to obtain clarification from the Revenue Integrity & Compliance Manager on questionable issues which may arise.

8.4 Business Inducements

EMSA’s Representatives shall not seek to gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting, or receiving any form of bribe or other improper payment is prohibited.

EMSA manages consulting, subcontractor, and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. EMSA promotes competitive procurement to the maximum extent practicable. EMSA’s selection of consultants, subcontractors, suppliers, and vendors will be made based on objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply. EMSA’s purchasing decisions will be made on the supplier’s ability to meet the needs of the organization, and not on personal relationships and friendships. EMSA employ’s the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities.

9. Protection of Assets

All EMSA representatives will strive to preserve and protect EMSA’s assets by making prudent and effective use of EMSA’s resources and properly and accurately reporting its financial condition. This Principle is intended to guide representatives by articulating EMSA’s expectations relating to activities or behaviors which may impact EMSA’s financial health, or which reflect a reasonable and appropriate use of a nonprofit entity’s assets.

9.1 Internal Control

EMSA has established control standards and procedures to ensure that assets are protected and properly used, and that financial records and reports are accurate and reliable. All EMSA Officers, Directors, and Team Members are responsible for maintaining and complying with required internal controls.

9.2 Financial Reporting

All financial reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent a transaction's relevant facts, or the true nature of the transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of EMSA and may violate applicable laws.

9.3 Accuracy, Retention and Disposal of Document and Records

Each EMSA representative is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure records are available to support EMSA's business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed to deny governmental authorities that which may be relevant to a government investigation. Medical and business documents and records are retained in accordance with applicable law and EMSA's record retention policy, which includes comprehensive retention schedules. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according to our policy. EMSA representatives must not tamper with records. No one may remove or destroy records before the specified date without obtaining permission, as the Company Records Management Policy outlines. Never destroy, change, or conceal any record if you have been instructed to keep it or if you know or think it's possible the record may be involved in an investigation or litigation. From time to time, EMSA's record retention policies may be suspended for purposes of a particular investigation, claim, or legal action, often referred to as a "litigation hold." If you receive notice of such suspension or litigation hold, all EMSA representatives shall comply with such directives contained in that communication until further notice. Finally, under no circumstances may an EMSA representative use patient, representative, or any other individual's or entity's information to personally benefit (e.g., insider trading or marketing of the data).

9.4 Travel

Travel expenses should be consistent with the Officers, Directors, or Team Members job responsibilities and the organization's needs and resources. It is EMSA's policy that an Officer, Director, or Team Member should not suffer financial loss or a financial gain because of business travel. Officers, Directors, and Team Members are expected to exercise reasonable judgment in the use of EMSA's assets and to spend the organization's assets as carefully as they would spend their own. Officers, Directors, and Team Members must also comply with EMSA's policies relating to travel expenses. All expenses must be submitted and approved by the Officer, Director, or Team Member's supervisor.

9.5 Personal Use of Corporate Assets

All Officers, Directors, or Team Members are expected to refrain from converting the assets of the organization to personal use. All property and business of the organization shall be conducted in the manner designed to further EMSA's interest rather than the personal interest of an individual Officer, Director, or Team Member. Officers, Directors, or Team Members are prohibited from the unauthorized use or taking of EMSA's equipment, supplies, materials, or services for personal use.

9.6 Electronic Media

All communications systems, including but not limited to computers, electronic mail, Intranet, Internet access, EMSA-provided telephones or tablets, and voice mail, are the property of the organization and are to be used primarily for business purposes in accordance with electronic communications policies and standards. Limited reasonable personal use of EMSA communications systems is permitted; however, users should assume these communications are not private and are potentially subject to the Open Records Act and EMSA's record retention policy. Users of computer and facility telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on any EMSA computer, telephone, tablet, electronic device of any kind and telephonic systems, and

EMSA reserves the right to monitor and/or access communications usage and content consistent with EMSA's policies and procedures.

Representatives may not use EMSA devices or EMSA-provided communication channels or access the Internet or social media to view, post, store, transmit, download, or distribute any threatening materials; knowingly, recklessly, or maliciously false materials; obscene materials; or anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws. Also, these channels of communication may not be used to send chain letters, personal broadcast messages, photos or videos, or copyrighted documents that are not authorized for reproduction.

Representatives who abuse EMSA's communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action including termination.

Representatives shall comply with EMSA's information security policies and standards governing the use of information systems. Individuals may only use their personal User IDs assigned to them individually and are not permitted to share or disclose any user account or password that is used to access EMSA's systems or information. Representatives shall never use tools or techniques to break or exploit EMSA's information security measures or those used by other companies or individuals.

10. Social Media and Social Networking

EMSA recognizes the importance of online social media networks as a communication tool. Our policy addresses team members' use of such networks, including personal websites, Web logs (blogs), wikis, social networks, online forums, virtual worlds, video/image sharing platforms, and any other kind of social media. We respect the rights of employees to use these media during their personal time. Use of these media during company time or on company equipment, however, is prohibited without proper authorization. EMSA takes no position on employees' decisions to participate in the use of social media networks. In general, team members who participate in social media are free to publish personal information without censorship by EMSA. Any posts that utilize EMSA branding and/or actual or assumed affiliation with the organization are prohibited unless prior authorization is given by EMSA's Chief Public Affairs Officer or their designee for the purposes of posting on EMSA's approved online social media platforms.

Every report of concern regarding a social media post is taken seriously and will be promptly investigated in accordance with applicable human resource policies.

Administration and Application of the Code of Conduct

Failure to abide by the Code of Conduct or the guidelines for behavior which the Code of Conduct represents may lead to disciplinary action including termination. For alleged violations of the Code of Conduct, EMSA will weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the Code of Conduct, the egregiousness of the behavior, the representative's history with the organization and other factors which EMSA deems relevant. Discipline for failure to abide by the Code of Conduct may, in EMSA's discretion, range from verbal warning to termination for Officers, Directors or Team Members. For the Board of Trustees, appropriate administrative action will be taken by the CEO in coordination with the Revenue Integrity & Compliance Manager and the Chair of the Board of Trustees.

Nothing in the Code of Conduct should be construed as providing any additional employment or contract rights to Officers, Directors, Team Members, or other persons or alter the at-will employment between you and EMSA. All Officers, Directors, and Team Members, including full-time, part-time, or temporary employees are at will employees, meaning you have the right to terminate your

employment at any time, with or without cause, reason, or advance notice. Likewise, as an at-will employer, EMSA has the right to terminate your employment at any time, with or without cause, reason, or advance notice.

EMSA reserves the right to modify, amend or alter the Code of Conduct. EMSA will generally attempt to communicate changes concurrent with or prior to the implementation of such changes.

In addition to the Code of Conduct, all EMSA's Officers, Directors, and Team Members are also reminded of EMSA's other personnel policies and other business policies that are relevant to the Officer, Director, or Team Members behavior and expectations in the workplace.

Officer, Director, and Team Member Participation and Reporting

It is the responsibility of every EMSA Officer, Director, and Team Member to abide by applicable laws and regulations and support EMSA's compliance efforts.

All Officers, Directors, and Team Members are required to report their good faith belief of any improper action, or in any violation of fraud, waste and abuse of the compliance program or applicable law. EMSA, at the request of the Officers, Directors, and Team Members, will provide such anonymity to the Revenue Integrity & Compliance Manager as is possible under the circumstances consistent with its obligations to investigate the Officers, Directors, or Team Members concerns and take necessary corrective action. Anyone who retaliates against someone who, in good faith, report or participates in the investigation of any compliance concern could be subject to disciplinary action up to and including termination of employment.

Officers, Directors, and Team Members may report their good faith belief of any improper actions, or in any violations of the fraud and abuse compliance program or applicable laws through the AlertLine (877) 874-8416 or via the website at <https://emsa.alertline.com/gcs/welcome>. This guarantees anonymity. If the Officer, Director, or Team Member prefers, he/she can voice concern; either orally or in writing to their manager; or by contacting the Revenue Integrity & Compliance Manager, at (918) 596-3028 or compliance@emsa.net. Anyone who knowingly makes a false accusation in reporting a violation will be subject to appropriate disciplinary action, up to and including termination.

Officers, Directors, Board of Trustees, or Team Members with questions regarding the existence of, interpretation or application of any law may call upon EMSA's Revenue Integrity & Compliance Manager. Also, questions regarding whether specific conduct or activities are ethical or otherwise appropriate should be directed to EMSA's Human Resources Director or Revenue Integrity & Compliance Manager.

When seeking guidance regarding any known or suspected violations of the Code of Conduct, questions can be brought in any one of the following ways:

- To the AlertLine (877) 874-8416 (The AlertLine guarantees anonymity.)
- To the AlertLine website at <https://emsa.alertline.com/gcs/welcome>. (This website guarantees anonymity.)
- You may contact your immediate supervisor
- By sending a confidential email to Compliance at compliance@emsa.net
- You may contact the Revenue Integrity & Compliance Manager, at (918) 596-3028
- By sending a confidential email to Human Resources at hr@emsa.net

Examples of what to report:

- Violations of the code of conduct
- Fraud, waste, abuse of EMSA assets
- Loss, theft of misuse of patient information

- Excluded individuals and entities
- Violations of Stark/anti-kickback regulations
- Inappropriate claims submission
- Illegal remuneration and referrals
- Other suspected violations of law or policy

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