

POLICY: Code of Conduct	
EFFECTIVE DATE: 1/8/2025	DEPARTMENT: Compliance
REVIEWED DATE: N/A	REVISED DATE: N/A

From Larry Nabb, Chief Executive Officer

Dear Jet Health Associate:

Jet Health is committed to conducting our business with integrity through honest and ethical behavior. Our mission is to provide superior care to our patients and to serve as a resource to all those involved in their care. We pioneer healthcare and provide clinical excellence wherever those we serve call home.

To assist in facilitating a strong compliance culture within our organization, the Company has adopted this Code of Conduct to serve as the guiding principle for our organization. The Code of Conduct is the foundation of our Compliance Program. These principles provide a framework for our business decisions and should be used as a guide to support our values and fundamental commitment to fostering an ethical work environment.

Compliance is an individual responsibility. Associates are required to familiarize themselves with and understand the Code of Conduct. Violations of the Code of Conduct may result in disciplinary action up to and including termination. For questions regarding this Code of Conduct or to report questionable activity, please contact your supervisor, the Compliance Department at compliance@jethealthinc.com, or to report a concern anonymously, the Compliance Helpline at (844) 678-0449.

Thank you for your support and commitment to our organization.

Sincerely,

Larry Nabb Chief Executive Officer Jet Health Compliance Program



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#### **DEFINITIONS**

I. <u>Associate</u>: "Associate" refers to all active Company personnel, temporary employees, part-time employees, full-time employees, independent contractors, clinicians, officers, and directors.

#### **OVERVIEW**

The goal of Jet Health ("Company") is to promote ethical, legal, and compliant behavior within the organization that encourages prevention, detection, and mitigation of conduct that does not conform to our standards, federal law, state law, or federal healthcare program requirements. The Company has developed a Compliance Program based on guidance provided by the Department of Health and Human Services Office of the Inspector General.

This Code of Conduct is intended to provide guidance on Company's ethical and legal standards to all Associates. More complex matters may require additional guidance for Associates directly involved in (1) training and education, and (2) policies and procedures direction from managers, supervisors, and legal counsel. If you have any questions about a compliance-related issue not covered fully within this Code of Conduct, you may:

- Speak to your Supervisor
- Contact the Compliance Department at compliance@jethealthinc.com
- Call the Compliance Helpline at (844) 678-0449

Compliance is a shared activity. All Associates are expected to observe high standards of business and personal ethics in performing their work. Adherence to Company's Compliance Program is a condition of employment. Disciplinary action for violations of the Compliance Program, this Code of Conduct, compliance policies/procedures, acts of noncompliance with state and federal laws/regulations, and federal healthcare program requirements will be enforced according to Company's policies and procedures.



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Thank you for your commitment to the Company's Compliance Program.

## **Purpose**

I. To establish uniformity in the conduct of our employees under the Compliance Program.

## Policy

I. The Agency has established Standards of Conduct with which all employees are expected to comply as a condition of employment to ensure that individual conduct conforms to the highest ethical standards and is consistent with all applicable laws, rules, and regulations.

## **Procedure**

- I. The Governing will adopt the Standards of Conduct and review annually thereafter.
- II. The Agency will educate staff regarding the Standards of Conduct upon hire and annually thereafter and provide a copy to every employee.
- III. Employees will sign a Compliance Pledge upon initial employment. This statement certifies that the employee has read and understands the Standards of Conduct and the Compliance Program and agrees to abide by it during the term of employment. On a yearly basis and in conjunction with in-service training, employees will be updated on the Compliance Program and sign a Compliance Pledge.
- IV. The Compliance Pledge will be maintained in the employee's personnel file.
- V. Employees will be informed of the method of communication and of the right to remain anonymous when reporting a suspicion of fraud, abuse, or any form of misconduct or improper activity.

#### Standards of Conduct

I. Equal Employment



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a. Jet Health believes in hiring, promoting, and compensating Associates without regard to race, color, national origin, age, gender, religious preference, marital status, sexual orientation, handicap, or disability. The Company is committed to equal employment practices and complying with all laws, regulations, and policies related to non-discrimination. These regulations include without limitation, Titles VI and VII of the Civil Rights Act of 1964, the Equal Employment Opportunity Act of 1972, the Age Discrimination in Employment Act of 1967, the Equal Pay Act of 1963, the National Labor Relations Act, the Fair Labor Standards Act, the Rehabilitation Act of 1973, and the Occupational Safety and Health Act of 1970.

#### II. Freedom from Harassment

- a. Jet Health prohibits any form of harassment, including harassment based on race, color, religion, gender, national origin, age, sexual orientation, disability, or any other basis protected by law. Jet Health expects its Associates to report violations to their supervisor, Human Resources representative, Chief Compliance Officer, or the Compliance Helpline.
- b. Harassment means different things to different people, so all Associates should refrain from any behavior that may be construed as offensive or inappropriate. Examples of inappropriate behavior include degrading jokes, intimidation, slurs, verbal harassment, and physical sexual harassment. Reports of harassment will be promptly investigated and Associates engaging in this behavior will receive disciplinary action up to termination

#### III. A Safe Environment

- a. All Associates are responsible for creating a safe working environment. Please use safety devices and report any potential/actual hazards to your supervisor. Hazards include security violations and/or criminal activity that take place on company premises. Please report any injuries or illnesses to your supervisor.
- b. Violence, intimidation, violent acts, and threats of violence have no place at the worksite and will not be tolerated.



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### IV. Maintaining Confidentiality

a. Jet Health honors the privacy of patients' and Associates' personal medical and non-medical information just as we expect our privacy to be protected. We promise to protect trade secrets and the confidential information that belongs to Jet Health, otherwise known as "intellectual property," and refrain from divulging information that could be harmful to the Company or that could provide an advantage to competitors.

### b. Confidentiality

- i. Jet Health is committed to preserving patient's protected health information. Protected health information includes health information, diagnosis, treatments, personal data, billing and contact information. More information is located in the Company's HIPAA Compliance Policies.
- ii. Jet Health is committed to preserving the right to privacy for all Associates and protecting the Company's interests. Associates must follow all applicable laws and company policies when using or sharing confidential information. The following information is classified as confidential:
  - 1. Associate information, personnel files, evaluations, and disciplinary matters.
  - 2. Business information including financial, marketing, and statistical data, competitive information, budgets, processes, techniques, mergers, acquisitions, significant reorganizations, bid proposals, contract negotiations, layoffs, research & development, business reports, and business summaries. This company-specific information is referred to as "intellectual property."

# V. Respecting Company Property

- a. Use of Resources Jet Health discourages inappropriate use of company property. Associates are trusted to act responsibly, reasonably, and maturely, as well as to use good judgment in the use of all company-related communications and computing devices, including:
  - i. The Internet



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- ii. All forms of printed and electronic media
- iii. Copying devices (scanners, copy machines, and other devices/applications used for duplication)
- iv. Telephones
- v. Cell phones
- vi. Portable/wireless PDAs
- vii. Desktop and laptop computers
- viii. Remote access/dial-up hardware and software devices
- b. Associates should not use a computer to transmit, store, or download materials that are threatening, maliciously false, or obscene. Facilities, equipment, technology, and resources are to be used only for business purposes in connection with job responsibilities.

## VI. Compliance with all Laws and Regulations

- a. Regulatory Obligations
  - i. Jet Health operates in a heavily regulated industry, subjecting the Company and its Associates to federal, state, civil, and criminal laws and regulations and health plan requirements. The penalties for violation of these laws, regulations, and requirements are severe and can apply to both the Company and any Associates involved. Penalties include fines, other financial penalties, exclusion from participation in federally funded programs, loss of licensure, and potential imprisonment. The Compliance Program is designed to prevent such violations. All Associates must be aware of and comply with the regulatory requirements applicable to their respective positions and duties.

# b. Illegal Activities -

i. The Company and its Associates will not engage, directly or indirectly, in any corrupt business practices and other illegal activities. Such activities include, but are not limited to, fraud, embezzlement, kickback arrangements, and drug use.



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- ii. The Company and its Associates will comply with all applicable federal, state, and local laws, including, without limitation, the federal Stark Law and regulations, the federal Medicare/Medicare anti-fraud and abuse statutes and regulations, the Health Insurance Portability and Accountability Act of 1996 ('HIPAA"), and the Health Information Technology for Economic and Clinical Health Act ("HITECH").
- iii. Fraud Fraud includes actions such as falsifying timecards and expense reports. Healthcare fraud occurs when someone schemes to defraud any health benefit program. This includes using false pretenses, representations, or promises to get money/property owned by any healthcare program with the delivery of, or payment for, benefits, goods, or services.
- iv. Kickbacks A kickback arrangement involves accepting or offering bribes or payoffs intended to induce, influence, or reward favorable decisions of any person or entity in a position to benefit the Company. Such persons or entities include customers, contractors, vendors, and government personnel.
- c. Copyright Law- Jet Health and Associates follow state, federal, and foreign laws pertaining to copyright protection, and laws that prohibit duplication of print materials, licensed computer software, and other copyrightprotected works.
- d. Relationships with Foreign Businesses and Governments As Jet Health takes advantage of global business opportunities, Associates must comply with all applicable laws and regulations governing relationships with businesses on foreign soil and their respective governments.
- e. Agency employees must comply with all federal, state, and local laws and government regulations.
- f. An employee must immediately and directly report to the supervisor or the Compliance Officer any actual or suspected violation of the Standards



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of Conduct, any related law or regulation, the Compliance Program, or any other Agency policy

- g. An employee must comply with all licensure laws and regulations.
- h. Ignorance of the law will not be tolerated.
- i. Employees are expected to attend all mandatory programs.

## VII. Compliance with all Agency Policies and Procedures

- a. Agency employees must comply with all agency policies and procedures, including those related to billing, administration, human resources, and clinical procedures. These policies may include, but are not limited to:
  - i. Equal Employment Opportunity
  - ii. Family Medical Leave Act
  - iii. Americans with Disabilities Act
  - iv. Occupational Safety and Health Administration (OSHA) regulations
  - v. Compensation
  - vi. Sexual harassment
  - vii. Fair Labor Standards Act
  - viii. Medicare, Medicaid, and other payor regulations
  - ix. Accreditation programs, as applicable

## VIII. Proper Claim Development and Reimbursement Documentation

- a. The Agency makes every effort to reconcile and submit accurate bills to the appropriate payor sources by implementing processes for proper claim development and reimbursement documentation.
- Employees are expected to submit accurate and factual documentation for services rendered.
- c. Actions that could violate the federal False Claim Act and other false billing laws include:



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- i. Filing a claim for services that were not rendered as described on the claim form:
  - 1. Services never provided
  - 2. Services provided that were not covered by the payor
- ii. Filing a claim for services that were rendered but were medically unnecessary:
  - 1. Lack of medical necessity
  - 2. Lack of compliance to payor eligibility
- iii. Submitting a claim containing information you know to be false:
  - 1. Forged MD signatures
- iv. Misusing Social Security or Medicare symbols, emblems, or names in marketing.

### d. Billing and Reimbursement

- i. The Agency is committed to ensuring that:
  - 1. Billing and reimbursement practices comply with all federal and state laws, regulations, guidelines, and policies.
  - 2. All bills are accurate and reflect current payment methodologies.
  - 3. Patients/clients and customers receive timely bills, when applicable, and all questions regarding billing are answered.

## e. Cost Reports

- i. The Agency will develop and submit a Medicare cost report annually to the Centers for Medicare & Medicaid Services (CMS), to include:
  - 1. Costs based on appropriate and accurate documentation
  - 2. Allocation of costs to various cost centers that are accurate with verified and audited data
  - 3. Allowable cost claims
  - 4. Properly classified costs
  - 5. Prior year audit adjustments by the fiscal intermediary are implemented and if claimed are clearly identified as protested amounts



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6. Identified related parties on Form 339 and all related party charges are reduced to cost

#### f. Government Customers

- The Agency has government contracts or subcontracts wherein the Agency supplies services to or on behalf of the Medicare and Medicaid programs.
  - 1. All employees must be knowledgeable of, and comply with, applicable laws, rules, and regulations of these government agencies.
  - 2. Billing personnel should comply with the Agency's policy on reimbursement and billing policies and procedures.
  - 3. Employees with concerns or questions regarding compliance with any government contract should contact the supervisor or the Compliance Officer.
  - Employees must obtain prior approval from the Compliance Officer to provide or pay for any meal, refreshment, entertainment, travel, or lodging expenses for government employees.

## g. Accurate Books and Accounts

- i. Agency payments and other transactions must be properly authorized by management to include, but not be limited to:
  - 1. Accurately and completely recorded in the Agency's books.
  - 2. Records in accordance with generally accepted accounting principles and established corporate accounting policies.
- ii. Assests must be regularly compared with actual assets and action taken to reconcile any variances.
- iii. No undisclosed or unrecorded corporate funds will be established for any purpose, nor will the Agency's funds be placed in any personal or non-corporate account.
- iv. All assets must be properly protected.

# IX. Referral Source Relationships



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a. The Agency prohibits activities that would compensate for increased referrals or provide incentives for obtaining more referrals from any referral source that could relate to any kickback issue.

#### b. Anti-Kickback Issues:

- i. Federal and state laws prohibit the Agency and its employees from offering a "kickback" to any person or organization to induce them to purchase services from or to refer a patient/client to the Agency.
- ii. Employees must take special care in this area, and refer questions to the Compliance Officer, who may refer to legal counsel.
- iii. Examples of actions that could violate the federal Medicare/Medicaid anti-kickback statute include, but are not limited to:
  - 1. Offering or paying anything of value to induce someone to refer a patient/client to the Agency
  - 2. Offering or paying anything of value to anyone (patient/client or referral source) in marketing the Agency
  - 3. Soliciting or receiving anything of value for the referral of agency patients/clients to others
  - 4. Receiving free goods of a kind other than the same good when purchasing products

## X. Dealing Honestly with All Internal and External Customers

#### a. Quality of Service

i. The Agency is committed to providing services that meet all contractual obligations and the Agency's quality standards.

#### b. Contract Negotiations

- i. The Agency has a duty to disclose current, accurate, and complete cost and pricing data where such data is required under appropriate federal or state law or regulation.
- ii. Employees involved in pricing or negotiation of contracts must ensure the accuracy, completeness, and currency of all data generated and given to supervisors and other employees, and all



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representation made to customers and suppliers, both government and commercial.

iii. False, incomplete, or misleading submission can result in civil and/or criminal liability for the Agency, the employee involved, and any supervisors who condone such a practice.

## c. Marketing and Advertising Activities

- i. We are committed to growing our business through well-trained, highly professional sales Associates. All sales Associates are committed to fair, forthright, and legally compliant sales, and marketing practices. Jet Health adheres to all state regulations that require sales representatives to be licensed.
- ii. Agency employees involved in marketing and advertising activities may offer factual, non-deceptive information or documented evidence to the general public. Most advertising and marketing materials require approval from regulatory agencies prior to distribution. When required, Jet Health will submit materials to agencies and ensure they are in full compliance with applicable regulations.
- iii. Associates do not engage in corrupt marketing practices, including misrepresentation of covered services and "redlining," which refers to the practice of avoiding sales in specific geographic areas or neighborhoods.
- iv. Agency employees will not distort the truth, make false claims, engage in comparative advertising, or attack or disparage another provider.

## d. Competitive Analysis

i. Antitrust laws prohibit competitors from entering into agreements to fix prices or to reduce price competition. These laws also protect the public against business competitors who band together or "collude" to unfairly set prices. Associates could violate these laws by discussing pricing, terms and conditions of sales with competitors, or dealings with customers, suppliers, or other



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competitors. Our competitors include other managed care organizations, healthcare delivery companies, and insurance companies that operate in our markets.

- ii. Employees should not provide business information to a competitor unless information is necessary to the customer/supplier relationship, or to jointly serve particular customers.
- iii. Associates who participate in trade associations or other meetings where competitors are likely to be present must be especially cognizant of antitrust rules.
- iv. Employees should not obtain information about a competitor's business directly from the competitor unless the information is necessary to the customer/supplier relationship, or to jointly serve particular customers.
- v. Employees may obtain information about a customer from public sources or from competitors.
- vi. In conducting a market analysis, employees should not accept or use information known to be proprietary to a competitor.
- vii. Supervisors must ensure that information is not improperly obtained or used in any improper fashion.

#### e. Antitrust Issues

- i. Employees may encounter antitrust issues in the areas of pricing, boycotts, and trade association activity which could include, but not be limited to:
  - 1. Entering into or negotiating an agreement with one or more competitors to:
    - a. Fix prices at any level or to fix other terms of service
    - b. Allocate customers or markets
    - c. Boycott a supplier or customer
  - 2. Employees must refrain from engaging in unfair practices that might restrict competition.

## XI. Employee/Employer Performances

a. Charging of Costs/Timecard Reporting



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- i. Employees must submit complete, accurate, and timely timesheets, being careful to ensure that hours worked, and costs incurred are applied to the account for which the effort was required.
- ii. Employees will sign the timesheet as representation that hours worked are accurate.
- iii. The supervisor's signature is a representation that the timesheet has been reviewed and steps have been taken to verify the validity of the expenses.

## b. Hiring of Federal and State Employees

i. Agency employees must obtain prior clearance from the Compliance Officer to discuss possible employment with, make offers to, or hire (as an employee or consultant) any current or former government employee (military or civilian).

## XII. Compliance with the Agency's Patient/Clients Rights Policy

- a. Patients'/Clients' Rights
  - i. Agency employees must comply with all standards set forth in the Patients'/Clients' Rights and Responsibilities statement.
  - ii. Employees must also comply with all patient/client care policies governing patient/client care practices and documentation.

## b. Advance Directives and Right to Die

i. Employees will comply with all agency policies and procedures, and federal and state laws and regulations governing Advance Directives and right to die issues.

#### c. Confidential Information

i. Confidentiality - Jet Health is committed to preserving patient's protected health information. Protected health information includes health information, diagnosis, treatments, personal data, billing and contact information. More information is located in the Company's HIPAA Compliance Policies.



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- ii. Employees must strictly safeguard all confidential information with which they are entrusted and not discuss information outside the normal and necessary course of agency business. This includes patient/client records and the information contained in the record.
- iii. Employees have an obligation to respect and protect the confidential nature of records regarding drug abuse, alcoholism or alcohol abuse, or other personal information of other employees.

## XIII. Using Agency Resources Properly

- a. Making Political Contributions
  - Federal and state laws dictate the amount and frequency of political contributions; Jet Health strictly adheres to those guidelines. Any other use of Company assets for political reasons is prohibited.
  - ii. Employees may not contribute or donate the Agency's funds, products, services, or other resources to any political cause, party, or candidate without advance written approval of the Compliance Officer.
  - iii. Employees may make voluntary personal contributions to any lawful political causes, parties, or candidate.
- b. Providing Business Courtesies to Customers or Sources of Customers
  - i. The Agency does not offer business courtesies such as entertainment, meals, transportation, or lodging to customers, referral sources, or purchasers of agency services, thus seeking to gain an improper advantage.
  - ii. Employees must not provide any referral source or purchaser with gifts or promotional items of more than nominal value (such as pens or calendars).

#### c. Charitable Contributions

i. All charitable contributions received from vendors must directly benefit the Agency. No check may be made out to an individual.



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- ii. The Agency will not accept any donations that are in conjunction with a marketing effort or sales promotion.
- iii. The Agency will not accept any donations that require the Agency to use the donation to purchase supplies from the vendor making the contribution.

## XIV. Avoiding Abuses of Trust

- a. Conflict of Interest While employed at Jet Health, Associates must refrain from any associations or activities that might conflict with Jet Health's interests. Company Associates also avoid doing business with competitors and accepting/giving gifts to contractors or customers. Associates are prohibited from taking advantage of the Jet Health association for personal gain.
  - i. Activities and Relationships Beyond Jet Health
    - 1. It is prohibited for Associates' personal lives to conflict with work or to pose a hazard to the Company.
    - 2. No full-time employee of the Agency may have any employment, consulting, or other business relationship with a competitor, customer, or supplier, or invest in any competitor, customer, or supplier unless written advance permission is granted by the Compliance Officer.
    - 3. Advance written permission is also required before an employee may invest in any privately held company or entity that performs services for the Agency, or that employs providers who may refer patients/clients to the Agency or to which agency patients/clients may be referred.
    - 4. Per diem employees may be employed by competitors but agree to keep patient/client information confidential and agree to non-disclosure of proprietary agency information.
    - 5. Steps Associates should follow to determine whether a conflict of interest exists:
      - Avoid personal outside activities and associations that might influence your business decisions and business-related objectivity; and



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- Avoid doing business with competitors or making significant personal financial investments in competitors, suppliers, or customers.
- 6. Each employee will sign a conflict of interest statement upon hire and as potential conflicts arise. If the employee has no conflict, they will indicate this on the form.
- ii. Examples of conflicts of interests could arise in the following situations:
  - 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 Jet Health.
  - 2. Hiring or supervising family members or closely related persons.
  - 3. Owning or having substantial interest in a competitor, supplier, or contractor.
  - 4. Having a personal interest, financial interest, or potential gain in any Jet Health transaction, other than a side-by-side investment.
  - 5. Placing company business with a firm owned or controlled by a Jet Health employee or his or her family.
  - 6. Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor or supplier, unless equally available to all Jet Health employees.
- iii. If you are not sure whether an outside activity represents a conflict of interest, contact your supervisor, Compliance Department or Compliance Helpline.
- b. Insider Trading
  - i. No employee of the Agency will trade in the securities of any company, or sell any property or assets, on the basis of non-public



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information acquired through employment at the Agency, whether such information comes from the Agency or from another company with which the Agency has a confidential relationship. Associates should be particularly vigilant when making presentations or proposals to clients to ensure that communications do not contain Material Non-Public Information.

- "Material Information" refers to information that is likely to affect the price of Jet Health stock or might affect the investment and/or voting decisions of shareholders and investors. Examples include: major new products or services, significant personnel changes, marketing strategies, mergers/acquisitions, financial results, business operations, or other development and strategic plans.
- 2. Non-Public Information. "Non-Public Information" concerning Jet Health refers to information that is not available to the general public and has not been widely circulated to the public through major news services.
- 3. Associates are prohibited from disclosing or discussing Material Non-Public Information with anyone outside of Jet Health. This rule broadly prohibits all such disclosures, not merely public disclosures. For example, you may not discuss Material Non-Public Information with friends or family members, even informally in speaking about your work. You may only discuss such Information with Company Associates and even then, only on a need-to-know basis. Disclosure restrictions also apply to information relating to any other company, including Jet Health's customers and providers, that you obtain in the course of your employment with Jet Health.
- 4. Non-public information concerning Jet Health does not become "public" until the close of trading on the second full day following Jet Health's widespread public release of the information. If you have questions, please contact your



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supervisor, Legal Department, Compliance Department, or call the Compliance Helpline.

### c. Acceptance of Business Courtesies

- Some forms of business entertaining including meals, social events or training, and educational activities – are accepted practices.
  - 1. The cost and scope of these activities should be reasonable and appropriate. Before accepting or extending such invitations, check with your supervisor.
  - 2. Associates should refrain from giving or accepting excessive gifts to or from vendors, customers, or other Business Associates. The value of gifts received or given should not exceed an aggregate value of \$500 per year unless prior approval has been given by a supervisor. Associates should never accept cash gifts from vendors, members, or customers.
- ii. Employees may not accept any gifts or promotional items of more than nominal value as they may appear to be offered in exchange for any type of favorable treatment or advantage.
- iii. Gifts of more than \$20 value must be reported to the Compliance Officer.

## d. Safeguarding the Agency's Restricted Information

- i. Employees may not disclose to any outside party any non-public business, financial, personnel, commercial, or technological information unless authorized in writing by management.
- ii. Upon termination/end of employment, an individual may not copy, take, or retain any documents containing the Agency's restricted information.
- iii. The prohibition of disclosing the Agency's restricted information extends beyond the period of employment as long as the information is not in the public domain.



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### XV. Responsibilities and Consequences

- a. Associate Responsibilities
  - i. Jet Health will provide all Associates with the training and education needed to be knowledgeable about our ethics and compliance initiatives. In return, Jet Health relies on you to help ensure that those initiatives remain a priority. This involves upholding all the standards outlined in this Code of Conduct, as well as reporting any suspected violations of those standards.
  - ii. If you observe potential violations of law or the Code of Conduct, you should not hesitate to report such issues. Failure to do so could pose a risk to the Company or, in the case of illegal activities or regulatory violations, a risk to you or your co-workers.

### b. Reporting Suspected Violations

- If you have a compliance concern to report, talk to your supervisor.
  If they are not available or are unable to assist you, contact the Compliance Department.
- ii. You may also report issues through the Compliance Helpline a service that allows violations or concerns to be reported anonymously. The Helpline is operated offsite by a third-party administrator and is available toll-free 24 hours a day, seven days a week, at (844) 678-0449.

#### c. Resolution, Communication and Non-Retaliation

i. Once a problem or suspected violation has been reported, Jet Health pledges to quickly investigate and resolve the problem. The Company will not retaliate against Associates for reporting compliance violations in good faith.

#### XVI. Where to Find Answers to Your Questions

a. The Code of Conduct Guidelines are meant to provide an overview of Jet Health's policies on ethics, compliance, and conduct-related issues. This publication is a living document and is subject to change as Jet Health



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refines its policies and procedures and as government agencies and regulators modify their rules.

- b. If you need more information or if you have a compliance-related question or concern, talk with your supervisor or the Compliance Department. These are the best sources when you need help understanding the laws, regulations, and practices that affect your work. Calling the Compliance Helpline is also an option if you wish to seek information on a specific company policy or standard.
- c. Associates are encouraged to explore the following resources:
  - i. Jet Health's Employee Handbook: The handbook covers various topics, including employment, benefits, performance reviews, wage & salary, and employee relations subjects such as dress code, workplace conduct, counseling, and health and safety issues.

#### References

Department of Health and Human Services Office of the Inspector General Guidance

Titles <u>VI</u> and <u>VII</u> of the Civil Rights Act of 1964

**Equal Employment Opportunity Act of 1972** 

Age Discrimination in Employment Act of 1967

Equal Pay Act of 1963

National Labor Relations Act

Fair Labor Standards Act

Rehabilitation Act of 1973

Occupational Safety and Health Act of 1970