



modivcare

Code of Conduct



Our Purpose

Making connections to care

Our Vision

We drive positive health outcomes by transforming the way we connect to care

Our Values

We treat everyone with dignity and **RESPECT**.

We earn the **TRUST** of our members, and each other.

We provide **RELIABLE** services that open doors.

We serve with courtesy and **COMPASSION**.

We prioritize **SAFETY**.

We communicate with purpose and **TRANSPARENCY**.

This version of the Code of Conduct is an abbreviated, high-level summary of the full Code of Conduct. During our mandatory Annual Compliance Training, all Modivcare employees must read and acknowledge receipt of the full Code of Conduct, located [here](#). Contact ethics&complianceofficer@modivcare.com for requests to translate this document.

January 2023



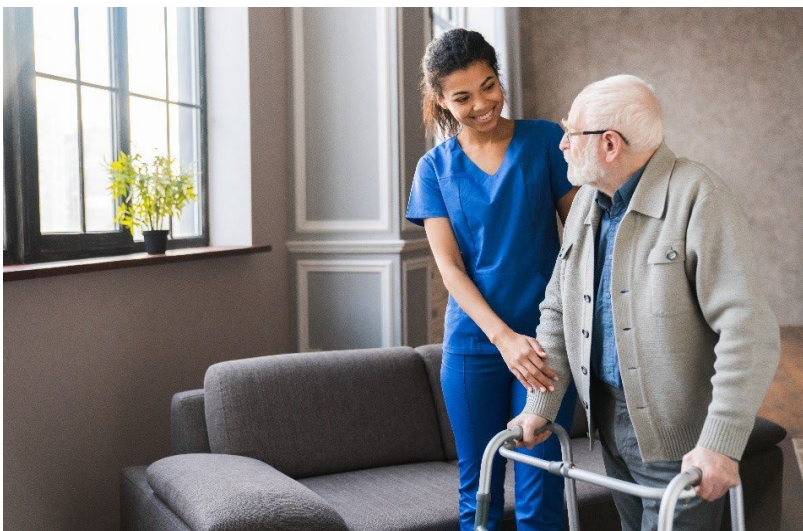
RESPECT. The foundation of Modivcare is our people, and we must treat everyone with **integrity, respect, honesty, and courtesy** at all times.

TRUST. We must keep job-related information **confidential**. We are trusted **not to share information** about the people we serve with others.

We also need to **trust each other**. When someone raises a concern, listen and elevate to a manager or Compliance.

RELIABLE. We must **avoid conflicts of interest** when our personal interests may conflict or appear to conflict with Modivcare’s interests. Examples include accepting gifts from clients and giving gifts or other benefits with the intent to increase sales. Second jobs may need to be reported if they cause an actual or perceived conflict with the company, our partners, or laws. Unsure? [Contact us!](#)

COMPASSION. Modivcare understands its clients’ needs, and we must **provide services with care and empathy** regardless of race, color, national origin, gender, age, religion, disability, veteran’s status, sexual orientation, gender identity, or as prohibited by law.



SAFETY. There is nothing more important than the safety and security of our people. Each team member is responsible to help **maintain a safe and welcoming environment** that is free from harassment, abuse, disrespect, or other unprofessional conduct.



TRANSPARENCY. Accurate reporting is critical to the financial health of Modivcare and, as a result, each team member must act in good faith to **maintain complete and accurate documentation**, including, but not limited to, client information (both personal and clinical), timesheets, trip logs, expense reimbursements, etc.

YOU HAVE A RESPONSIBILITY TO REPORT

Each of us has a responsibility to make sure our own actions are within the Code of Conduct. Notify Modivcare Compliance if you are asked to do something or become aware of something at Modivcare that violates the Code of Conduct. You may be contacted for more information. Every person has the same duty to report, regardless of job title or position. When in doubt, reach out!



OUR COMMITMENT TO YOU

Your report to us will remain **confidential** and is only shared on a need-to-know basis.

You may report **anonymously** through our Ethics & Compliance hotline.

Modivcare will **not retaliate** against a person for reporting a concern or possible Code of Conduct violation in good faith.

HOW DO I REPORT A CONCERN OR ASK A QUESTION?

Choose any method below that you are most comfortable with to report a concern or ask a question:

- **Communicate** the question or concern to your manager, Compliance or Legal
- Reach out directly to our Chief Compliance Officer, Jody Kepler, any member of the **Compliance team**, or email Ethics&ComplianceOfficer@modivcare.com
- Call our **toll-free Ethics & Compliance Hotline** at 855-818-6929 (includes option to report anonymously)
- Make a report to the **online Ethics & Compliance Hotline** at <https://ethicshotline.modivcare.com> (includes option to report anonymously)
- For Privacy/HIPAA concerns, email the **Privacy Officer** at HIPAAOfficer@modivcare.com

WHAT ARE SOME EXAMPLES OF CONCERNS THAT SHOULD BE REPORTED?

- A caregiver **submitting timesheets** or a transportation provider submitting **trip logs** for work not performed
- **Conflict of Interest** concerns or issues
- Exchanging **gifts** or items of value with clients, members, regulators, or consultants
- **Falsification** of documents (e.g., forging signatures, misrepresenting services provided)
- **Privacy** concerns (e.g., a caregiver, transportation provider, or CSR sharing client information without permission)
- **Non-compliance** with regulatory requirements or company policy (e.g., not following the rules)
- **Disclosing of confidential** information (e.g., private business, financial, or client health information)