



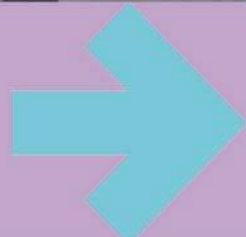
CODE OF ETHICAL CONDUCT

2023



35 WEST 35TH ST
FLOOR 6
NEW YORK, NY
10001

WWW.DocGo.COM
(866) DocGo





Message from the CEO of DocGo



DocGo is committed to providing exemplary service to our patients. It is our goal to maintain the highest level of integrity, ethics, transparency, and morale. This Code of Ethical Conduct (Code) is intended to be the blueprint to help us navigate through rules, expectations, culture, and ethical decision making. We aim to provide the utmost quality of care, maintain patient privacy, and work collaboratively with our business entities, partners, and government regulators. Commitment to this Code fosters the reputation of DocGo in our markets and ensures full compliance with all federal and state health care program requirements.

I urge you to review the Code, adapt the policies into your daily work life and be transparent, without fear of retaliation should you witness a potential problem or area of opportunity for improvement. In short, if you see something, say something. Our Code can serve as a resource when you need guidance on Compliance related issues. All of us play an important role in sustaining these values and the quality of care that we provide to our patients.

A thriving Compliance Program requires active participation from everyone. Reporting Compliance concerns is mandatory. Please speak to your Manager, Human Resources, the Compliance Department, or use the Anonymous Hotline if you feel something is unethical or illegal in any of our business practices.

Thank you for your role in ensuring that DocGo continues to be a leader in the healthcare industry through our commitment to the highest ethical standards.

Sincerely,



Anthony Capone

CEO





CODE OF CONDUCT SUMMARY:

WHAT IS THE CODE OF ETHICAL CONDUCT?

A Code of Ethical Conduct is a tool that we can use to help create and maintain a culture of integrity, accountability, and values to achieve our mission and vision for a better healthcare atmosphere.



HOW IS IT APPLICABLE TO YOU?

The Code of Conduct is applicable to all employees, agents, independent contractors, members of the Board of Directors and volunteers. Everyone is required to review the Code of Conduct and comply with the Compliance Program.

OUR COMMITMENT TO COMPLIANCE

Our reputation for quality service, excellent care, and compliance with the law and high ethical standards is achieved by the personal integrity, good judgment and common sense of our personnel. Our personnel need to exhibit those traits when dealing with or otherwise engaged in conduct that affects our patients, their families, fellow personnel, suppliers, vendors, consultants, and others with whom we do business. We commit to provide each of our personnel the policies, procedures, and guidelines with which they must abide by ensuring compliance with this Code of Conduct.

BOARD OF DIRECTORS RESPONSIBILITIES

The Board oversees the Compliance Program.

LEADERSHIP RESPONSIBILITIES





Employees, who have supervisory responsibilities, are expected to model appropriate behavior and create a culture that promotes ethical behavior in the workplace in which all personnel are encouraged to raise concerns. Supervisors are to provide their staff with guidance on how to comply with laws, regulations, policies, code of conduct, and the resources to resolve conflict.

NON-DISCRIMINATION (DIVERSITY AND INCLUSION)

DocGo will not discriminate on the basis of race, color, national origin, ancestry, religion, sex, pregnancy, age, disability, genetics, political belief, military service, ability to pay, or any other protected class.

All personnel are encouraged to report any incident in which the individual feels there has been discrimination.

WORKPLACE CONDUCT & EMPLOYEE PRACTICES

Personnel must conduct their responsibilities in compliance with applicable laws, rules and regulations, and federal health care program requirements. Furthermore, all personnel will follow all policies and procedures adopted by DocGo.

DocGo will revise from time to time, policies, and procedures to comply with laws and regulations important to the provision of health care services, including fraud, waste and abuse prevention, detection of violations, and compliance efforts.

INDIVIDUAL JUDGEMENT

DocGo personnel are often faced with making critical decisions based on matters they encounter in the performance of their work. When making such decisions personnel will always use good judgment and common sense. If anything within this Code of Conduct goes against personnel's own good judgment, they are encouraged to discuss it with the Compliance Officer or other member of management.

PATIENT RIGHTS

DocGo is dedicated to protecting its patients' personal privacy and confidentiality of information consistent with DocGo's mission, applicable laws (including HIPAA) and quality standards. Communication and disclosure of patient information will be clear, accurate and sufficiently complete, and be in accordance with HIPAA Privacy Rule standards.

CONFIDENTIAL INFORMATION

Personnel will not use DocGo confidential or proprietary information for their own personal gain or for the benefit of another individual or entity, while associated with DocGo or at any time thereafter. Information concerning a patient is confidential. Personnel will not access, use or disclose details of a patient's condition without a specific professional reason for doing so, except as required by law. Violations will be handled in accordance with DocGo disciplinary policies, and our HIPAA Compliance policies and procedures, where applicable. All new personnel, prior to performing any substantial duties with DocGo that involve patient





interaction or information, will undergo the mandatory privacy training as required under the HIPAA Privacy Regulations.

CORPORATE CITIZENSHIP, RESPONSIBILITY AND SUSTAINABILITY

DocGo works very closely with the communities it serves to address and anticipate societal impacts and public concerns. Approaches include: community forums; email, social media, blogs, web-interface to identify service offerings; collaborating with the communities to improve services including pandemic related testing and vaccination; reducing readmissions and access to care; waste management/ recycling efforts; leader involvement in community, professional boards and volunteer activities; collaboration with community and government agencies. We reduce our consumption of natural resources and our impact on the environment. We have an active program and work to reduce our carbon footprint. We use electronic medical records that improve patient care and reduce waste. We ensure that we properly dispose of hazardous materials and that we maintain all certifications required to use such materials. We are committed to Human Rights. We are proud to publish an annual sustainability report that describes DocGo's efforts.

SANCTION SCREENING

DocGo will not knowingly employ, contract or bill for any individual or entity that has been listed as debarred, excluded or is otherwise ineligible for participation in federal or state healthcare programs. We routinely search the lists of excluded and ineligible persons including the U.S. Department of Health and Human Services, Office of Inspector General, the General Services Administration and State Department of Health exclusion lists. All personnel are required to report to us if you become excluded, debarred or ineligible to participate in federal or state healthcare programs or have been convicted of a criminal offense related to the provision of health care items or services.

COMPLIANT BUSINESS RELATIONSHIPS

DocGo will take all actions necessary to ensure compliance with federal and state laws regarding referrals and business arrangements. Business arrangements with any referral sources (such as skilled nursing facilities and hospitals) will be set forth in a written contract and will be in accordance with applicable federal and state laws. Payments by DocGo to any referral source will be at the fair market value of the services rendered or items being purchased by DocGo and will not be based on the volume of transports or the value of referrals generated by the referral source.

ANTI-COMPETITIVE PRACTICES

DocGo will take all actions necessary to ensure compliance with federal, state and local laws and regulations that prohibit price-fixing and other anti-competitive practices. This includes compliance with all laws and regulations related to the procurement of EMS, ambulance services, or billing service for a municipality or other government entity.

GOVERNMENT INVESTIGATIONS





DocGo cooperates fully with government inquiries and investigations. We do not prevent persons affiliated with us from speaking with government officials. However, you should contact your supervisor and the Office of Corporate Compliance, which will coordinate our response to ensure that it is appropriate and complete. We never destroy, alter or change DocGo records requested by or related to a government investigation.

COMPLIANT BILLING

DocGo will deal honestly with all payers (e.g., Medicare, Medicaid, self-pay patients, insurance companies, HMO's, etc.). Claims submitted to Medicare and other governmental and private payers will be complete and accurately reflect the services rendered. Claims submitted to Medicare and other federal health care programs for reimbursement for services will be done in accordance with federal health care program participation requirements, and will be supported by necessary documentation. Billing issues will be resolved by DocGo according to applicable laws, regulations, organizational policies and, where applicable, payer contracts. Questions regarding patient billing will be resolved expeditiously. If personnel are unsure of the proper response to a question or inquiry, they will contact the Compliance Officer or other responsible person in our organization's chain of command for direction.

COMPLIANCE WITH FEDERAL, STATE, LOCAL LAWS, AND REGULATIONS

To meet adherence with federal, state, local laws, and regulations, DocGo does not solicit, offer, pay or receive any payment or any monetary value from physicians, providers/hospitals/vendors that are reimbursable by Medicare or Medicaid programs or private pay coverage.

DocGo does not engage or offer items or services for free or below fair market value to beneficiaries of federal and/or state health programs in such a manner to induce referrals.

Under federal and state kick-back laws, it is a crime to knowingly and willfully solicit or receive something of value to induce or reward referrals of business for which payment may be made under federal state and healthcare programs such as Medicare and Medicaid.

COMMITMENT TO CONFLICT OF INTERESTS

A conflict of interest may occur if an individual's personal interests interfere or seem to be interfering with his or her ability to make sound decisions on behalf of the organization. Personnel will conduct themselves in a manner that encourages and preserves the trust of those we serve. Personnel will not have financial relationships with parties with which DocGo does business without prior disclosure and approval of the Compliance Officer. Prompt disclosure of conflicts of interest will be made to the Compliance Department. Violations will be handled in accordance with applicable disciplinary procedures. It is expected that all personnel avoid situations and behavior that could otherwise compromise the mission, vision, and integrity of DocGo.





COMMITMENT TO ANTI-KICKBACK LAWS

DocGo will take all actions necessary to ensure compliance with federal and state anti-kickback laws. Our personnel will not give or receive kickbacks, rebates or anything of value to a vendor, patient, physician or other healthcare provider in exchange for a referral for services or the generation of other business. Our agency will ensure that all services are priced at fair market value and not less than the actual cost of providing the service.

COMMITMENT TO SUPPLY CHAIN ETHICS

All DocGo personnel who are involved in/or with purchasing or other supply-chain related functions, must act, and be seen to act with integrity and the promotion of efforts to prevent any violations of human rights and labor conditions.

CONFIDENTIAL BUSINESS INFORMATION

We have an obligation to protect all DocGo health confidential information from unauthorized use. Confidential information covers anything related to DocGo operations that is not publicly known.

RECEIPT OF GIFTS, GRATUITIES AND BUSINESS COURTESIES

Staff members shall not solicit or accept personal gifts, business courtesies or services from patients, vendors, or business associates as doing so may be an actual or perceived conflict of interest. All gifts are approved by and tracked by the Compliance Office.

REPORTING OF COMPLIANCE CONCERNS

All personnel that have a compliance concern or believe there is a possible violation of this Code of Ethical Conduct or other compliance related policies and procedures should report that information immediately to the Compliance Officer. Reported concerns will be logged and investigated by a member of the Compliance Officer.

If an individual is uncomfortable with reporting a compliance concern in a manner that discloses their identity, he or she may report the concern anonymously through our anonymous reporting system by visiting www.docgo.ethicspoint.com or calling the anonymous Hotline at **(844) 996-0286**.





In reporting compliance concerns directly to the Compliance Officer, if personnel wish to remain anonymous, they may do so by either not disclosing their identity or by requesting that their confidentiality be protected. The Compliance Officer will make reasonable efforts not to identify an individual making an anonymous report, unless it is subsequently determined that the individual engaged in improper conduct. Although reasonable efforts will be expended to assure the anonymity of those reporting compliance concerns, circumstances may exist that require the individual's identity to become known in connection with the investigation such as if governmental authorities become involved. If the nature of the compliance complaint or concern requires disclosure it will be disclosed only to the extent necessary or advisable to address and resolve the matter.

NO RETALIATION FOR GOOD FAITH REPORTING OF CONCERNS

DocGo does not condone retaliation against any personnel for reporting, in good faith, an actual or suspected violation of the law and regulations, and/or our policies and procedures. All personnel should feel comfortable reporting concerns in good faith knowing that DocGo will not retaliate, and will maintain confidentiality and anonymity with respect to such disclosures.

DocGo will immediately investigate and take appropriate action with respect to all suspected acts of retaliation or intimidation. Any individual who is found to have retaliated against an employee or intimidated an employee will be subject to immediate discipline, up to and including termination of employment.

TRAINING AND COMMUNICATION

In addition to the extensive training curriculum and extensive communications plans, we also use Captain Integrity to spread Compliance News.



ACKNOWLEDGMENT

All personnel will be required to annually acknowledge receipt.

The Compliance Hotline

The Compliance Hotline is available 24 hours a day, seven days a week. Compliance Hotline calls may remain anonymous and those who choose to give their name will have their identities protected to the extent allowed by





law. The Compliance Hotline has multi-lingual operators who can take reports from individuals whose first language is not English. The Compliance Hotline can be reached by calling **(844) 996-0286** or by visiting www.docgo.ethicspoint.com .

Compliance Team	Title	Email
Stephen Sugrue	Chief Compliance Officer & HIPAA Privacy Officer	ssugrue@docgo.com
Jennifer Anderson	Director of Billing Compliance & HIPAA Privacy	janderson@docgo.com
Damaris Pichardo	Manager of Compliance & Regulatory Affairs	dpichardo@docgo.com
Daniel Goldenberg	Manager of Compliance Audits	daniel.goldenberg@docgo.com

Compliance policies are referenced in this Code. Other compliance policies are available via the DocGo intranet site or an electronic or hard copy can be obtained from a supervisor or the Compliance Office.

References:

- ◆ [Compliance Policies](#)
- ◆ [HIPAA Policies](#)
- ◆ [Employee Handbook](#)

