Code of Conduct

Do the Right Thing the Right Way

Dear USACS team,

At US Acute Care Solutions (USACS), we live by our mission and values every day. Our accountability for corporate and personal results and our commitment to shared success rely on a foundation of integrity. Our Code of Conduct (Code) helps guide us to “do the right thing the right way” and plays a critical role in our ongoing success and commitment to our employees, patients, and the communities we serve.

The Code provides basic instruction and guidance concerning the principles of behavior upon which our company is based. Each USACS employee, independent contractor, and member of the Board of Directors is expected to understand and apply the principles and standards contained within the Code. This is fundamental in aligning our interests with those we serve.

As you go about your daily work activities, follow your moral compass and use our Code as your guide. If you have questions about doing the right thing, never hesitate to ask your manager, contact our Chief Compliance Officer, or call the Ethics Hotline.

We value and encourage an open environment where people feel comfortable asking questions and raising concerns. By speaking up if you see or hear something that isn’t right, you are supporting our collective responsibility to protect our outstanding reputation and the values on which our company was built: Servant’s Heart and Owner’s Mind. Without your commitment to ethical behavior, USACS would not be the industry leader it is today and will remain in the future.



Dominic Bagnoli, MD, FACEP, FAAEM, Executive Chair, Board of Directors

Principles of Conduct

USACS is dedicated to being the leader in integrated acute care by providing patients with the highest-quality services. In pursuing this mission, USACS expects all of its employees to “do the right thing the right way” by acting legally and ethically as they carry out their job duties.

We are pleased to present the USACS Code of Conduct (Code). The Code reflects our values and ethical standards and summarizes many different USACS policies and procedures – which are available electronically or by contacting the Compliance and Ethics Department.

The Code provides basic instruction and guidance concerning the principles of behavior upon which our company is based. The obligations contained within the Code apply to our relationships with patients, Physicians, APPs, third-party payers, independent contractors, vendors, and one another. It is the obligation of each and every one of us to understand and apply the principles and standards contained within the Code.

The basic principles are as follows:

- Treat All Patients With Appropriate Care, Dignity, and Respect
- Keep Patient Information Confidential
- Treat Others as You Would Like to Be Treated
- Maintain Personal Wellness
- Report Illegal or Unethical Conduct
- Be Honest, Truthful, and Ethical
- Obey the Law
- Maintain Accurate and Timely Records
- Avoid Behavior That Creates a Conflict of Interest

Our Values

Servant's Heart

- Be All In: We show up, do the right thing, and have grit. We hold ourselves to the highest standards of excellence.
- Solve Together: We welcome every voice and respect every role. No matter what, we've got each other's backs.
- Make a Difference: Every action, decision, and moment of care is a chance to impact a patient's life.

Owner's Mind

- Think Big: We keep a growth mindset. We are unafraid to challenge convention, innovate, and be better.
- Be Bold: We trust our people to do the right thing and empower them to make decisions on the frontline.
- Play the Long Game: We are relentless in building an enduring practice that is owned and led by Clinicians—for the next 10 years and beyond

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What We Do

We Serve Our Patients

Treat All Patients With Appropriate Care, Dignity, and Respect

We take all reasonable steps to provide each patient with high-quality medical care that is appropriate and necessary for the patient's medical condition. We provide treatment without regard to gender, age, financial status, disability, race, color, creed, religion, national origin, veteran status, or sexual preference.

Keep Patient Information Confidential

USACS patients expect that information gathered about them during the course of their medical care will be kept confidential. This includes information concerning their medical treatment, personal lives, and families. It is our obligation, legally and ethically, to do everything we can to preserve and safeguard patient confidentiality. Inappropriate release of protected health information could be injurious to our patients, our business partners, and USACS.

Providing Emergency Treatment

We comply with the federal Emergency Medical Treatment and Labor Act (EMTALA).

Here's How:

- We provide a medical screening exam (MSE) and any necessary stabilizing treatment to all patients who come to a hospital for emergency treatment.
- Qualified medical personnel conduct the MSE and (if necessary) stabilizing treatment.
- We only transfer patients with emergency medical conditions to another facility when it is appropriate to do so.
- We do not delay an MSE and/or any stabilizing treatment to obtain financial or demographic data.
- We do not treat, admit, or discharge patients with emergency medical conditions based on insurance status, ability to pay, or any other discriminatory factor.

> *"My patients don't come to the hospital to see me. They come because they are in crisis. However, I see them as more than the symptoms that brought them here. Each patient is a fellow human being whose condition impacts a circle of family and friends. My calling is to provide care with the patients' best interests in mind."*
>
> *Rajneesh Mathur, DO, FACEP, MBA, Regional Vice President, South Division*

Frequently Asked Questions (FAQs)

Q: We received a call from a private practitioner informing us that a patient needing a consult was en route to our standalone facility. I met the patient to explain our capabilities and that she would need to be transferred to the main hospital for a consult. The patient left, irritated at having to visit a third location. My intent was to save the patient time and money. Did I violate EMTALA?

A: Yes. Once a patient has "come to the hospital," EMTALA requires that the patient be provided with an MSE within the capabilities of the hospital. The Physician's intentions are not relevant to whether EMTALA was followed, and the actions in this scenario discouraged the patient from accepting the required MSE.

Q: A patient I was treating in the emergency department insisted on being transferred to another facility before her condition was stable. Does EMTALA permit me to transfer a patient in this situation?

A: Yes. EMTALA requires that a transfer occur at the patient's request so long as (a) the patient has been informed of the hospital's obligation to provide treatment without the need for transfer; (b) the patient has been informed of the risks and benefits of the requested transfer; (c) the hospital has used its best efforts to have the patient sign a written statement acknowledging these things and affirming the patient requested the transfer; and (d) all four requirements of an appropriate transfer have been met.

Key Points

- Only qualified medical personnel (defined by the hospital by-laws or rules and regulations) may conduct an MSE. Know your hospital's policies before conducting an MSE.
- Medical record documentation is the best way to demonstrate EMTALA compliance.
- Consult the USACS EMTALA policy and procedures for more information. If you still have questions, contact the USACS Legal Department for assistance.

Protecting Patient Information

We are committed to protecting our patients' information by complying with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH), state confidentiality laws, and USACS and site privacy and security policies.

Here's How:

- We only access patient information necessary to do our jobs.
- We keep passwords confidential by not sharing them with others or saving them in places where others can find them.
- We only share patient information with individuals who are authorized to have it.
- We lock our computers when we leave our desks and secure any paper records appropriately.
- We send patient information outside of USACS only when we are authorized to do so and only using secure methods, such as encrypted emails.
- We do not access patient information to satisfy curiosity.
- We do not access or share patient information to follow the care provided to a family member (such as a spouse or adult child) without written permission from the patient.
- We do not share any patient information on social media platforms without advance written permission from the patient to do so.

In addition, we regularly review our privacy and information security policies and participate in formal training to that all employees understand their roles and responsibilities in protecting patient information.

4 Requirements of an Appropriate Transfer

1. The transferring hospital provides treatment within its capacity to minimize the risks to the patient (and any unborn child, if the patient is a woman in labor).
2. The receiving hospital has available space, qualified personnel, and has agreed to accept the transfer.
3. The transferring hospital sends all medical records relating to the patient's emergency medical condition.
4. The transfer occurs with qualified personnel and transportation equipment (including any necessary life support measures).

Frequently Asked Questions (FAQs)

Q: I saw in the news that a celebrity was taken for emergency treatment at a USACS site. Am I permitted to access the medical records to see if the person is okay?

A: No. The fact that a person is being treated at a USACS site is protected information, and no one should access the chart or share details of the treatment unless there is a business reason for doing so. HIPAA permits us to access a patient's record for:

- Treatment (providing care to the patient);
- Payment (accurately billing the patient's insurance company);
- Operations (performing a quality review of the care provided to the patient, if this is part of your role at USACS); and/or
- Other reasons (such as marketing or research) only as permitted by HIPAA, HITECH, and site and/or USACS polices.

Q: I have a laptop I use to access my email and other USACS systems. It has been two weeks since I saw the device. Should I report this to someone?

A: Yes. It is important to report this potential security incident immediately to the IT Service Desk at (330) 492-4559 ext. 1265 or (866) 857-4357 so we can determine whether there has been a reportable breach of patient information. There are strict deadlines in which to report breaches, and we need as much time as possible to investigate the matter and comply with reporting requirements.

Q: I heard an amazing story from my colleague about how she saved a patient's life. Am I allowed to post a story on my Facebook page about the situation if I remove the patient's name? I am very proud to work at USACS and want to share the incredible work we do.

A: No. Social media, in its many different forms, is a fun way to stay in touch with family, friends, and colleagues, share photos, and keep up on the news. It is not a place to discuss individual patients. Even without the patient's name, someone may be able to identify the patient from other details in the post or from the news media (who are not required to follow HIPAA). At USACS, we only publicize patient success stories when the patient has authorized the information to be shared in advance or the Communications and Compliance teams have reviewed and approved the stories.

Key Points

- Use or disclose patient information only when there is a business reason for doing so.
- Ask questions before accessing or sharing patient information if you are not sure whether it is appropriate.
- Report any lost or stolen patient information immediately to the USACS Chief Compliance Officer directly or by contacting the hotline at (844) ETHICS9 or hotline-services.com.
- Report any lost or stolen device or any other potential security incident involving USACS electronic systems to the IT Service Desk at (330) 492-4559 ext. 1265 or (866) 857-4357.

What We Do

We Serve Our People

Treat Others as You Would Like to be Treated

We respect the rights, privacy, and dignity of patients, fellow employees, and others in order to promote relationships based upon mutual trust and respect. Professionalism is shown to and expected from all. We do not tolerate any form of discrimination or harassment.

Report Illegal or Unethical Conduct

We report activity that may be illegal or unethical, including actual or suspected violations of the USACS Compliance and Ethics Program. Employees may contact their supervisor, the Compliance and Ethics Department, or the Ethics Hotline to ask questions or report concerns. Reports to the hotline can be made anonymously. We do not tolerate any retaliation for good faith reporting of potential illegal or unethical activity.

Maintain Personal Wellness

USACS employees maintain personal wellness to be able to fulfill their professional responsibilities. This includes physical, emotional, social, and spiritual wellness. Maintaining personal wellness helps us contribute to the USACS team in a positive and engaging manner and is necessary for long-term career success.

Embrace a Diverse and Inclusive Workplace

We are committed to creating an equitable, diverse, and inclusive environment for our employees. We're united by our values, and we celebrate the unique experiences, perspectives and cultural backgrounds that each employee brings to our workplace. We strive to foster an environment where our employees feel respected, valued, and empowered, and our team members are at the forefront in helping us promote and sustain an inclusive workplace.

> *"At USACS, inclusion is not just having a seat at the table, but it is having a voice and having that voice be heard. We don't see diversity and inclusion as business goals, but rather, being inclusive is a part of our culture that starts at the executive level all the way to the front line."*
>
> *Jayne Kendall, MD, MBA, FACEP, CDE, CPE, Chief of Engagement and Talent Management*

Fulfilling Leadership Responsibility

Every USACS employee is responsible for following the Code. Leaders have an additional responsibility to serve as role models and demonstrate how to live our USACS values every day.

Leaders help their employees do what is right according to this Code and applicable laws, regulations, and policies. Leaders also set the tone for our culture of compliance, letting their teams know they will be supported in asking questions and raising concerns, and emphasizing that USACS does not permit retaliation for reporting a suspected violation of law or policy in good faith. Leaders take prompt action when someone reports a potential violation of law or policy and seek assistance as needed from the Chief Compliance Officer in a timely fashion to address questions and concerns.

Meeting Employee Responsibility

We are all responsible for maintaining the highest professional and ethical standards in conducting USACS business.

Here's How:

- We read the Code to understand what is expected of us and ask questions if we have them.
- We complete compliance training in a timely fashion.
- We certify our commitment to follow the Code.
- We follow the Code and related USACS policies in performing our everyday work. We seek guidance from our leaders or the Compliance and Ethics Department if we are still unsure of the right thing to do.

Frequently Asked Questions (FAQs)

Q: I heard information about a co-worker violating company policies that concerns me, but I don't know if it's true. Should I report the situation?

A: Yes. We should all be careful not to participate in, or encourage, the spread of rumors about our co-workers. However, employees have an obligation to report possible violations. Your report will be taken seriously and investigated.

Q: Will I get into trouble with my supervisor if I contact the Ethics Hotline?

A: No. It violates our policy for any employee to retaliate against another employee for reporting a concern in good faith. We want our employees to feel comfortable with their obligation to report these concerns. Each report is evaluated carefully to determine who needs to be involved in investigating the matter, and we only share information with those who have a need to know.

Q: If I report a concern to the Ethics Hotline, will I be required to give my name?

A: No. You may choose to remain anonymous when reporting a concern. If you do choose to identify yourself, every effort will be made to keep all information regarding you and the investigation confidential.

Reporting Compliance Concerns

We promote an open culture of compliance where people are supported in asking questions if they are unsure what to do or raising concerns if they believe there has been a violation of law, the Code, or USACS policies. Each of us at USACS has a duty to report compliance concerns in a timely manner. USACS is committed to its policy of not retaliating against individuals who make good faith reports of potential compliance issues. Employees who do not feel comfortable reporting an issue within their chain of command or contacting the Compliance and Ethics Department directly can report via the Ethics Hotline. Employees may file a report anonymously if they wish. We do not trace, track, or monitor the origin of hotline reports. We maintain the confidentiality of the reporter within legal limits. All questions and concerns will be addressed promptly and subsequent resolutions will be monitored by the Compliance team.

How to Report a Concern:

- Communicate with an immediate supervisor or manager.
- Contact a member of higher management.
- Contact the Chief Compliance Officer directly.
- Contact the Ethics Hotline (available 24/7/365) (844) ETHICS9 or hotline-services.com.

Types of Issues to Report:

- Situations that feel wrong or make you uncomfortable.
- Concerns about conduct you believe violates USACS policies or may put USACS at risk.
- Concerns about conduct you believe violates federal or state law or regulations.
- Lost or stolen patient information.
- Medical billing irregularities.
- Conflicts of interest or questions about gifts and business courtesies.

Maintaining a Positive Work Environment

We are committed to a supportive work environment where employees have the opportunity to reach their fullest potential. Everyone is expected to maintain a respectful workplace culture that is:

- Free of harassment or intimidation.
- Free of bias or discrimination of any kind.

Furthermore, the safety of our employees and patients is foremost in our minds. As such, we prohibit employees from using, possessing, or selling illegal substances or being under the influence of alcohol or impaired by medication while at work.

Similarly, While Conducting USACS Business, You Are Prohibited From:

- Making threats.
- Committing acts of violence or intimidation.
- Carrying a firearm.

Finally, a positive work environment is supported by people with a generally positive disposition. Be kind, empathetic, and practice the Golden Rule with your colleagues and patients.

Supporting Personal Wellness

Our patients require us to think, act quickly, and provide compassionate care. Our vision is to create a practice that is sustainable, creates lifelong partnerships, enhances personal growth, and promotes personal wellness. The company provides health and welfare benefits to support this mandate. We encourage employees to see their doctor on a regular basis, keep a healthy diet, and make time for moderate exercise. We also urge employees to pursue activities outside of work, take vacation, engage in hobbies, and spend time with family and friends. Our jobs are demanding, but should never cause us to sacrifice our overall personal wellness.

Key Points

- Leaders are role models for ethical behavior and are responsible for creating a culture where people understand their responsibilities and feel comfortable raising concerns.
- Employees have a responsibility to report ethical concerns and can do so through a variety of channels.
- We absolutely prohibit retaliation against anyone who raises an ethical concern in good faith and will discipline anyone who engages in retaliatory behavior.
- We maintain a positive culture of respect for employees and demonstrate our commitment to personal wellness.

What We Do

We Serve Our Community

Be Honest, Truthful, and Ethical

Every employee adheres to the highest ethical standards in all professional and business activities and acts in a manner that enhances USACS' position as an ethical contributor to the healthcare community. All communications within USACS and to patients and outside entities and agencies, including government representatives, are truthful, accurate, and complete. We ensure payment from government reimbursement sources such as Medicare and Medicaid and private payer sources is for care that was reasonable and necessary, provided by properly qualified persons, supported by documentation, and billed in the correct amount. The appropriate billing codes are utilized regardless of any impact on reimbursement.

Obey the Law

There are many laws and regulations governing the activities of USACS, particularly those relating to billing and reimbursement, conflicts of interest, and employment. We take all reasonable steps to comply with the laws and regulations of which apply to our particular job functions and duties. USACS has policies in place to help explain those requirements. We ask for help – from our leaders, the Compliance and Ethics Department, and/or the Legal Department – if we are not certain what the laws, regulations, or policies and procedures require.

Complying With Federal and State Laws

We are committed to following all applicable laws and regulations governing our business activities, such as EMTALA, HIPAA, fraud, waste, and abuse laws, billing and reimbursement requirements, and employment laws. We provide guidance to employees in the form of policies, procedures, and education to help them know and follow legal requirements. Each of us is empowered and expected to ask questions if we are not sure what to do, and USACS maintains a confidential hotline to allow employees to raise issues anonymously.

Responding to Government Inquiries

We are truthful, courteous, and professional in our encounters with government representatives. Once we learn of a government inquiry involving USACS, we immediately notify the General Counsel, the Chief Compliance Officer, and our executive leader. If a government representative makes an unscheduled visit to a USACS location, we await direction before answering questions or providing documents or other information. At no time do we conceal, alter, or destroy information once we learn of a government inquiry.

Maintaining High Ethical Standards

USACS maintains a Compliance and Ethics Program, which helps us understand the expectations of our roles. We continuously strive to do the right thing, the first time, every time. We understand integrity is exercised through everyday decisions. We help each other to do what we must and what is right when the path forward is unclear. The Compliance and Ethics Program supports these shared values and emphasizes our individual responsibility to live our values every day. Our goal is to maintain a culture of compliance identified by the respect, trust, and integrity we show each other, our patients, and our communities. Every employee plays a role in this effort.

Key Points

- We understand and comply with all laws and regulations that apply to our business activities.
- We live our compliance values every day in dealings with each other, our patients, and our communities.
- We respond to government inquiries honestly and professionally.

What We Do

We Serve Our Company

Maintain Accurate and Timely Records

All medical records are properly documented as required by law, regulation, payer requirements, and professional standards. Additionally, all billing records are accurate and detailed concerning the date and place of service, the identity of the patient and provider, the service provided, and the corresponding professional charges.

Avoid Behavior That Creates a Conflict of Interest

Personal interests, such as financial investments and family businesses, that could impact or appear to impact our USACS business decisions are called conflicts of interest. We avoid actual or perceived conflicts of interest. We do not accept gifts or other items of value exceeding the annual monetary gifts and business courtesy limit defined in USACS policies. All bribes, kickbacks, and other payments prohibited under federal or state laws or regulations are also prohibited by USACS policy.

> *"Accurate documentation is more than a record of what a patient has experienced; it is a crucial map guiding their healthcare journey."*
>
> *Casey Collins, MD, FACEP, Chief Documentation Officer*

Keeping Accurate Records and Reports

USACS maintains policies on when to retain or destroy business and medical documents. Documents may include electronic files such as email or computer files stored on USACS computers or networks, paper documents such as letters, memos, or printouts of electronic files, or information in any other portable format or medium.

We are responsible for knowing and following the document retention requirements applicable to the USACS documents we create and maintain on behalf of the company.

No one may remove or destroy business or medical record documents prior to the time outlined in the USACS document retention policies without first obtaining permission.

Protecting Confidential Business Information

We safeguard the confidentiality of USACS operations and strategy information. Here are some examples of private USACS information:

- Employee lists and personnel data.
- Passwords to various electronic systems.
- Strategic planning documents.
- Information about planned or pending mergers, acquisitions, divestitures, or affiliations.
- Financial statements.
- Accounting information.
- Marketing strategy information.
- Supplier and contractor information.
- Managed care contract information.

Frequently Asked Questions (FAQs)

Q: A former work colleague is negotiating a contract with a vendor USACS uses. May I share the pricing and terms of our contract to help my former colleague get the best deal?

A: No. The pricing and key terms of vendor contracts are confidential and should not be shared with anyone outside of USACS without obtaining prior permission from the Legal Department.

Q: I took work home over the weekend, which included drafts of strategic planning documents. My car was vandalized, and my USACS laptop, printouts of the drafts, and the USB drive containing the underlying financial information were stolen. What should I do?

A: You should report this theft to law enforcement and file a police report. In addition, you should notify your manager, as well as report to the IT Service Desk at (330) 492-4559 ext. 1265 or (866) 857-4357 and the Chief Compliance Officer directly or via the Ethics Hotline at (844) ETHICS9 or hotline-services.com.

Providing Accurate Billing and Coding Services

We are committed to fair and accurate billing and coding that is in accordance with all federal and state laws and regulations. We maintain policies, procedures, and internal controls to ensure our compliance with these laws and regulations. We bill only for services rendered, and all claims have adequate supporting documentation in the patient's medical records.

- We follow USACS coding and billing policies in accordance with applicable laws and regulations.
- We bill only for services that were actually provided.
- We identify and refund over-payments.
- We maintain quality assurance processes to ensure the accuracy of our billing and coding.
- We do not assign inaccurate codes to increase reimbursement.

Key Points

- We keep all information regarding USACS operations confidential.
- We follow USACS billing and coding policies to ensure our claims are accurate and submitted in accordance with all applicable laws and regulations.
- We maintain transparency in our business dealings to avoid conflicts of interest and report any potential conflicts to the Compliance and Ethics Department for guidance.

Conflicts Of Interest and Business Relationships

Conflicts of Interest

We want to ensure our patient care and business activities are conducted in an objective manner and not motivated or clouded by the potential for personal or financial gain. As a result, we disclose potential conflicts of interest in advance and seek approval before engaging in the outside activity. We owe a duty of loyalty to USACS, and we do not use our employment status to profit personally or assist others in profiting at the expense of USACS.

Gifts And Business Courtesies

In certain situations, we may extend to or accept from a business partner an invitation to a meal or event (such as a sporting event or concert) to further USACS' business relationship with that partner. Even when doing so, however, we follow USACS policies on giving or receiving gifts and business courtesies to ensure we avoid the appearance of improper influence in making patient care and business decisions.

We never offer or accept gifts or business courtesies to influence the referral of patients, nor do we permit employees to give or receive cash or cash equivalents (such as gift certificates). We follow our USACS policies governing gifts and business courtesies and seek written permission in advance from the Chief Compliance Officer, Chief Executive Officer, or General Counsel before taking action on a situation that is unclear or not covered by the policies.

Using Resources Responsibly

We use USACS resources for USACS business, not for personal financial gain. Resources include the following:

- Employee time and effort.
- Materials and supplies.
- Communications equipment and software, such as computers, electronic data, telephones, faxing capabilities, internet access, voice mail, or email.
- Confidential USACS business information.
- Copyrighted or licensed third-party software.

We ask for permission from our supervisor prior to using USACS assets for a community or charitable purpose.

All USACS communication systems are the property of USACS and are available for employees to use in conducting USACS business. These systems are not private and can be accessed if necessary to conduct a compliance investigation or in response to an appropriate request from an outside entity.

Frequently Asked Questions (FAQs)

Q: What is a conflict of interest?

A: A conflict of interest is any situation in which financial or other personal considerations may compromise or appear to compromise an employee's business judgment, delivery of patient care, or the ability of an employee to do his or her job. Most conflicts of interest can be managed if disclosed in advance.

Q: What types of situations could create a conflict of interest and should be reported in advance?

A: Here are some examples:

- Being employed by a company that competes with, contracts with, or is a supplier to USACS.
- Maintaining outside interests that could, or could appear to, impact patient care decisions.
- Having an outside job or consulting arrangement that requires you to share USACS confidential business information or distracts you from your USACS role.
- Making business decisions or selecting vendors/partners to benefit family members or friends.
- Using USACS confidential business information, property, or resources to benefit yourself personally or to further a non-USACS business.
- Having a supervisory or other position of influence with a family member or friend.
- Please contact the Chief Compliance Officer directly or the Ethics Hotline at (844) ETHICS9 or hotline-services.com if you would like to report a potential conflict or ask questions about USACS policies.

Q: My team and I have been working for months to implement a new software product at USACS. At the end of the project, the vendor offered me and everyone on the team a fleece jacket and bag with the vendor's logo. Are we allowed to accept this?

A: Yes, if the value of the gifts does not exceed the annual monetary gift limit (as defined in USACS policy) per person per year from a particular vendor. Just remember, employees are never permitted to accept cash or cash equivalents (such as gift certificates) and should seek guidance if they are unsure whether a gift from a vendor is appropriate under USACS policies.

Q: I have been invited to attend a training seminar by a vendor on a product USACS is purchasing. The vendor is offering to pay the cost of travel, meals, lodging, training, and entertainment for two days. May I accept the offer?

A: Yes, with advance permission from the Chief Compliance Officer and Chief Executive Officer. Employees may accept invitations to attend training, educational, or informational events. Travel and overnight accommodation requests must be approved in advance and should include a description of the event, its relevance to the employee's role, the employee's direct supervisor's approval for attending, and the estimated cost of the entire event (including meals and entertainment).

Thank You!

We appreciate the efforts of our employees who live by the values of this Code every day. We are here to support you in doing the right thing the right way.

-The Compliance and Ethics Department

Questions? Concerns?

Contact the USACS Compliance and Ethics Department directly by email at ethics@usacs.com

You may also contact the Ethics Hotline (available 24/7/365)

(844) ETHICS9 or hotline-services.com.

The hotline is staffed by an outside company. You may choose to file an anonymous report.

Remember: USACS strictly prohibits retaliation against any employee who reports in good faith.

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Approved by the USACS Compliance Review Committee