



Standard Operating Procedure

Topic: Veyo Code of Conduct and Ethics

SOP Identifier: Veyo_Compliance_005

Author	Initial Issue Date	Latest Revision Date	Version	Revised By	Approved By
Mike Sawyer	3/15/2016	3/23/2021	2022 v1.0	Jennifer Kinberger	Jennifer Kinberger

Summary:

The purpose of this policy and procedure is to outline Veyo’s Code of Business Conduct and Ethics.

Company Personnel Affected by this Procedure:

All Veyo Employees and Contractors

Forms or Files Utilized:

Veyo Conflict of Interest and Competition Statement and Attestation

Policy:

This Code of Business Conduct and Ethics (“Code”) has been adopted to instruct Veyo’s Officers, Leaders, Employees and Business Partners in business and ethical conduct.

This Code should be interpreted liberally, since Veyo’s policy is to conduct its activities in accordance with the highest standards of behavior.

Veyo recognizes that rapid changes in business constantly pose new ethical and legal considerations. Therefore no set of guidelines can address every situation or should they be considered the absolute last word under all circumstances. We encourage our employees to consult with any Veyo Officer, Manager, or Corporate Compliance, if there is any doubt as to the proper course of action.

Every Employee is responsible for adherence to this Code and must attest, at least annually, that they have read, understand and will comply with it. The Code of Conduct is reviewed in the Annual Compliance Training. Employees are notified of any updates to the Code of Conduct via email and/or company-wide communications from the Compliance Department.



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This Code applies to Veyo (“Company”), and all references to Veyo include Veyo and all its Related Providers.

Procedure:

1. General Ethical Standards and Due Care

Employees and Business Partners must exhibit loyalty in all matters pertaining to the affairs of the Company. Employees must not knowingly be a party to any fraud or other illegal or improper activity. Everyone is expected to adhere to high standards of personal integrity. For example, perjury or any other illegal act taken to “protect” the Company, sales made by deceptive practices or quotas achieved through questionable means or numbers is wrong and will not be tolerated by Veyo.

Staff and Business Partners must conduct themselves in an ethical manner, act in good faith, responsibly, with due care, competence and diligence by conducting all business activities with the highest level of integrity. To accomplish this, Staff and Business Partners must:

- Observe professional standards;
- Continually evaluate existing procedures to identify potential noncompliance and FWA;
- Make process improvements to ensure that appropriate standards are met;
- Be knowledgeable of and exercise diligence with applicable laws, regulations, corporate and departmental policies; and
- Address deficiencies by reporting them to Veyo management or Corporate Compliance.

2. Conflicts of Interest and Competition

Veyo strives to maintain the highest standards of integrity and is committed to integrity and fairness in the conduct of all its activities. Accordingly, any appearance of a conflict must be avoided. To maintain Veyo’s reputation and credibility, we have adopted the following policy.

Conflict of Interest: Any situation or interest that might interfere with an Employee’s judgment in exercising his/her responsibilities for Veyo is a potential Conflict of Interest and must be avoided. Examples of common Conflicts of Interest include, but are not limited, to:

- a. *Loans:* Lending to or borrowing money from Veyo, other than:
 - i. Routine expense advances made and approved in the ordinary course of business; or
 - ii. Short-term advances against 401(k) hardship withdrawals or 401(k) loans against account balances that have been approved by the Plan Administrator.

- b. *Compensation:* Paying or accepting compensation related to work for Veyo, other than salary or other compensation Veyo pays in the ordinary course of business to its Employees.
- c. *Illegal or Unethical Payments:* In dealing with public officials and private business associates, the Company will utilize only ethical commercial practices. Employees are prohibited from giving, offering or accepting anything that can be construed as a bribe, kickback or an illegal or unethical payment in connection with Veyo or its activities.
- d. *Favors:* Accepting a gift, favor, service or privilege, including travel or entertainment, that is of more than nominal value or that exceeds the level of business courtesies routinely extended from an existing or potential customer or supplier, in order to influence Veyo's decision about a transaction, loan or compensation. Examples of gifts of nominal value include such items as coffee mugs, pens, notepads and the like.
- e. *Competition:* Engaging or having an interest in an activity that is in competition with Veyo.

Simply stated, every decision made by any Employee should be motivated with the best interests of Veyo in mind, not personal gain.

Note: Veyo prohibits Full-Time, Part-Time, and Temporary Employees from partnering with Veyo as a contracted Third Party Operator (3PO) driver, Independent Driver Provider (IDP), Regional Provider Operator (RPO), Volunteer Driver, or participating as a driver or receiving reimbursement under Veyo's Mileage Reimbursement (MRB) Program. This is considered a conflict of interest.

What to do if a Conflict of Interest Cannot be Avoided: An Employee who has a Conflict of Interest must immediately report the Conflict of Interest to Corporate Compliance at compliance@veyo.com or People Operations hr@veyo.com and include full disclosure about the Conflict of Interest, avoid participating in or attempting to influence any Veyo decision affected by the Conflict of Interest and keep all Veyo information confidential. In other words, be open and honest about any Conflict of Interest and take appropriate steps to diminish any harm to Veyo.

All Veyo employees review and sign the Veyo Conflict of Interest and Competition Statement and Attestation on an annual basis.

3. Confidential Veyo, Vendor, Customer, and/or Prior Employer Information

Employees must not use sensitive, confidential and/or proprietary information for any personal gain, nor in any manner which would be contrary to the law or detrimental to the welfare of the Company.

Employees must use and protect PHI (Protected Health Information) in accordance with Veyo_Compliance_006 HIPAA and PHI.



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While the Company may hire individuals who have knowledge and experience in various fields, it is not Veyo's intent to employ such persons as a means of gaining access to the confidential information of others. Employees will not ask new employees to divulge sensitive, confidential and/or proprietary information and Employees will not divulge sensitive or confidential information obtained from past employment.

4. Trade Secrets

Trade Secrets are Veyo's intellectual property that gives us an advantage over the competition because it is not generally known and we take reasonable steps to keep it secret. Examples of our Trade Secrets include our customer lists and contacts, pricing formulas, computer programs and databases, marketing or promotional plans, instructional and training methods as well as the trade secrets we learn from companies we do business with in the normal course of our business transactions.

Employees must keep all of Veyo's Trade Secrets confidential and secure. If any employee is unsure whether information is considered a Trade Secret, she/he should ask any member of management for guidance.

5. Antitrust Compliance

In compliance with antitrust laws, Veyo's policy is that we will independently determine the cost and other terms for our services. No Employee should discuss cost or other terms for its services with other enterprises that are in direct or indirect competition with Veyo.

6. Outside Income

No Employee may conduct a personal enterprise during the time periods committed to the Company by position or schedule. Additionally, employees may not accept compensation from outsiders for services to or time spent on behalf of Veyo.

7. Fraud, Waste and Abuse

Fraud, Waste and Abuse is addressed in detail in Veyo_Compliance_007 Fraud, Waste and Abuse policy.

8. Public Statements

It is important that Veyo's public communications are consistent and accurately reflect the Company's position and image. Therefore, no Employee may make any public statement, written or verbal, to any media outlet on behalf of Veyo without prior written approval from the President or an EVP of Veyo. Media outlets include news and trade publications as well as any electronic source.

9. Business and Accounting Practices

The integrity of Veyo's accounting and financial records is based on the validity, accuracy, and completeness of basic information supporting entries to the Company's books of account. Every Employee involved in creating, processing or recording such information is held responsible for its integrity and is responsible for full, fair, accurate, timely, and understandable disclosure in the periodic reports required to be filed by the Company.

Every accounting or financial entry should reflect exactly that which is described by the supporting information. There must be no concealment of information from, or by, management or from the Company's independent auditors.

Employees who become aware of possible omission, falsification or inaccuracy of accounting or financial entries or basic data supporting such entries are held responsible for reporting such information to any member of management or Corporate Compliance.

10. Human Resources

Veyo is committed to treating all individuals, inside and outside the Company, with dignity and respect. We will endeavor to provide a work environment free of all forms of harassment or discrimination, and it is each employee's obligation to assist the Company in that endeavor.

Veyo is committed to comply with Federal, State and local laws and ordinances. Within the organization, Veyo has multiple policies and procedures to address specific issues and ensure consistent practices throughout the Company.

Every Employee is expected to abide by the Human Resources' Guidelines and procedures. Veyo maintains a drug-free work environment.

11. Discrimination

Veyo does not doesn't exclude, deny benefits to, or otherwise discriminate against any person in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, whether carried out by CMS directly or through a contractor or any other entity with which CMS arranges to carry out its programs and activities.

Veyo, LLC complies with all applicable Federal and State civil rights laws and does not exclude people or treat them differently because of race, color, national origin, religion, national origin, age, medical status or genetic information, disability, sex, gender identity or expression, or sexual orientation. Veyo ensures accessibility to all services by

individuals with disabilities pursuant to the Americans with Disabilities Act (ADA) (28 CFR § 35.130) and Section 504 of the Rehabilitation Act of 1973 (29 USC § 794) and maintains capacity to deliver services in a manner that accommodates the needs of its customers, as applicable. NEMT and NMT Vehicles comply with the Americans with Disabilities Act (ADA) specifications for transportation, 49 CFR § 38, subparts A and B, as applicable.

Veyo also complies with the nondiscrimination agreements and warranties under CT Gen Stat § 4a-60a (2012), as amended.

12. Other Violations

Any employee or business partner who suspects related violations such as social engineering (for example: email that attempts to manipulate a person into performing actions or divulging confidential information) or human trafficking should also be reported to Corporate Compliance.

13. Anti-Retaliation

It is a violation of this Code to discriminate or retaliate against any employee for reporting a suspected violation of any Federal, State, or Local law. Supervisory and Management personnel have a special responsibility to demonstrate high ethical standards in their behavior and a duty to handle reports of suspected violations properly by reporting them to Corporate Compliance or any member of Senior Management.

14. Cooperate With All Investigations

Veyo expects truthful and honest responses when participating in internal investigations or external agency reviews, audits or investigations.

Internal Investigations

It may be necessary to conduct internal investigations to determine whether or not non-compliant activities have occurred. Cooperation and timely responses, without fear of retaliation, are required to ensure the prompt investigation and resolution of ethical and compliance issues.

Concerns about retaliation should be reported to Corporate Compliance.

Retaliation is prohibited against those who, in good faith, report inappropriate activities. Anyone who intentionally makes a false report, who has knowledge of, or suspects a possible violation of laws or regulations and does not report it, will be subject to disciplinary action up to and including termination.

Reviews by External Agencies

Veyo cooperates with all reviews by authorized external agencies in a direct, open and honest manner. No action may ever be taken that would mislead a reviewer or survey team.

Individuals approached by someone stating that they are a government agent should confirm the representative's authority by requesting identification and obtaining the person's name, office, address, telephone number and identification number. Individuals must immediately notify their managers who will immediately notify Corporate Compliance who will determine the legitimacy and scope and establish the proper procedures for cooperating with the investigation.

Government Investigations

Veyo agrees to permit and will fully cooperate with any authorized federal or state officials who conduct an onsite review as well as all legal demands made in any government investigation.

Individuals may agree or refuse to talk with a government investigator and recognize that they have the right to seek legal counsel before responding to any questions. In all cases, it is imperative to tell the truth.

It is against Veyo's policy and a violation of the law to prevent, obstruct, mislead, delay or attempt to prevent, obstruct, mislead or delay the communication of information or records to a government investigator. Staff and Business Partners that knowingly and willingly, falsify, conceal, or cover up by a trick, scheme or device, a material fact; or make any false statements or fraudulent representations to a Federal agency may be subject to fines, imprisonment or both.

During a government investigation, all policies enabling the destruction of documents must be suspended until the investigation has been completed and Corporate Compliance has reinstated the policies. If a subpoena or other legal document (such as a Civil Investigative Demand) from any government agency is received, the manager must contact Corporate Compliance.

15. Reporting of Violations

Every Veyo employee and contractor has a responsibility to report violations of Veyo's code of conduct or other compliance concerns. Veyo will make every reasonable effort to maintain the anonymity of any Staff or Agent (if requested) who reports suspected or observed misconduct, but they will be informed that there may be some circumstances under which it is necessary to disclose the reporter's identity during the investigation.

Violations can be reported to:



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Email: compliance@veyo.com
Veyo Compliance Hotline: 888-482-8458

16. Violations and Disciplinary Action

Violations of our Code and policies will constitute grounds for disciplinary action, up to and including termination of employment. Conduct that violates this Code may also violate national or state laws and can subject an employee and the Company to civil and criminal penalties. No employee should be misguided by any sense of loyalty to the Company or a desire for profitability that might cause him or her to disobey any applicable law or our Company’s policies.

Employees and contractors are not subject to disciplinary or other actions when making good-faith reports of violations of legal, regulatory, or ethical requirements. Any employee or contractor who is aware of a violation of Code of Conduct, or applicable laws or regulations and does not report it, or who is not aware of a violation of the Code of Conduct, or applicable laws or regulations that should have been detected, is subject to disciplinary action, up to and including termination of employment or relationship with Veyo.

Review and Revision History

Date of Revision	Revision Version	Contributors	Change Summary
3/15/2016	2016 1.0	Mike Sawyer	Initial release of SOP
3/20/2017	2017 1.0	Mike Sawyer	Annual review
7/27/2017	2017 1.1	Joanne Tan	Formatting changes; removed reference to alcohol free work environment
12/12/17	2018 v1	Mike Sawyer	Annual review and update. Adding paragraph “other violations”
12/19/2018	2019 v1	Jennifer Kinberger	Annual review; Added CMS



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			non-discrimination language.
5/13/2019	2019 v1.1	Jennifer Kinberger	Added Contractors to Affected entities and IDP prohibition for Veyo Employees
8/28/2019	2019 1.2	Jennifer Kinberger	Updated Conflict of Interest section to include policy statement and further clarify prohibited activities in the "Note" section; added Conflict of Interest statement reviewed/signed by Employees on an annual basis.
10/03/2019	2019 1.3	Jennifer Kinberger	Added Forms section; added 3PO driver to the Note section under Conflicts of Interest and Competition.
1/9/2020	2020 1.0	Jennifer Kinberger	Annual review; added reference to CT statute in Section 11.
6/10/2020	2020 2.0	Jennifer Kinberger	Annual review; updated notification methods to Code of Conduct changes; updated Non-discrimination statement to be consistent with website; added reporting section and enhanced violations and disciplinary actions section



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3/23/2021	2021 1.0	Jennifer Kinberger	Added violation reporting methods to "Reporting of Violations" section.
6/28/2021	2021 1.0	Jennifer Kinberger	Annual review; no changes needed at this time.
3/22/2022	2022 1.0	Jennifer Kinberger	Reviewed for 2022. No changes needed at this time.