

THE GLOBAL MEDICAL RESPONSE BUSINESS CODE OF CONDUCT AND ETHICS





Nick Loporcaro

President and
Chief Executive Officer
Global Medical Response

OPERATING WITH INTEGRITY

Our Principles in Practice

Dear Colleagues,

At Global Medical Response (GMR), we're proud of the exceptional patient care we provide, extending safe, high-quality care into our communities, wherever and whenever we're needed. It takes skilled people doing demanding work in distinct roles to make that happen. It also requires that the communities we serve continue to choose us, and that's something we earn every day.

We do this by upholding the highest standards of ethical behavior and integrity, by adhering to a set of principles and by putting those principles into practice. The Global Medical Response Business Code of Conduct and Ethics reflects our commitment to just that and serves as a guide for all our actions and decisions.

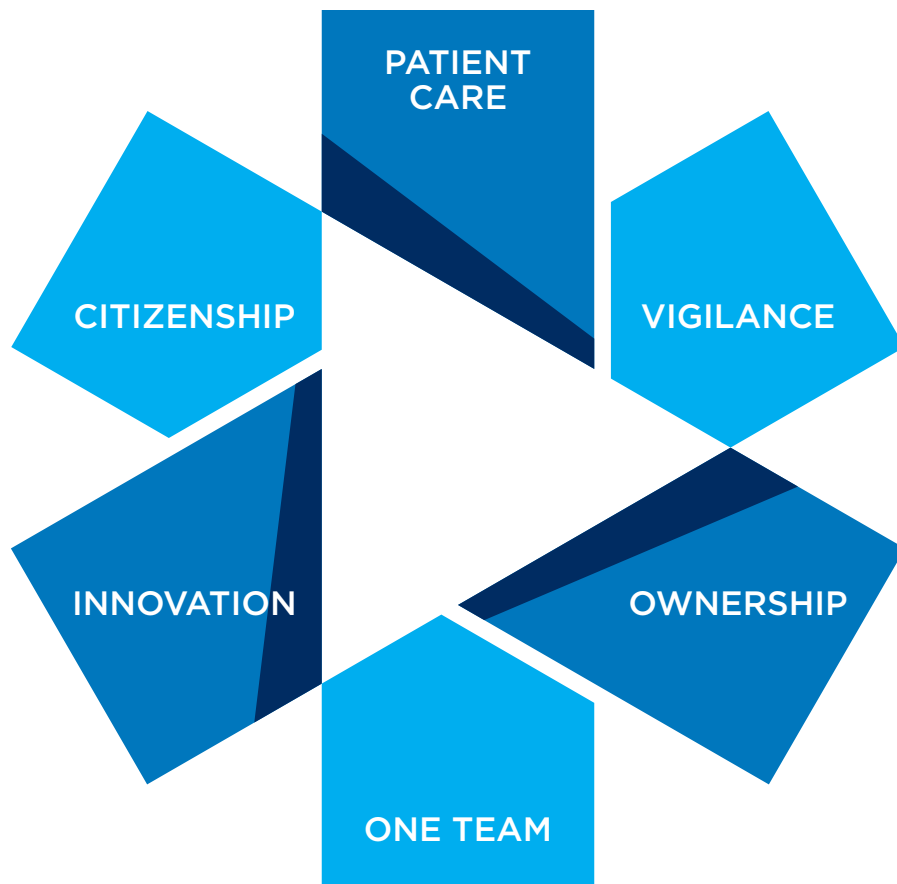
We each play a vital role in earning and maintaining the trust of our patients, their families and the communities we serve. By adhering to this Code, we each demonstrate our personal dedication to ethical practices and our Guiding Principles.

I encourage you to read this document carefully and integrate its principles into your daily work. This Code and associated policies, along with our new-hire and annual trainings, form the foundation of our ethics and compliance program.

Thank you for your continued commitment to serving our communities with distinction and integrity and for the excellent work you do every day.

Sincerely,

A stylized, handwritten signature in black ink, appearing to read 'Nick Loporcaro'.



GUIDING PRINCIPLES

Our mission is providing care to the world at a moment's notice and our Guiding Principles direct our actions in everything we do.

PATIENT CARE

We continually earn the privilege to care for our patients. It is at the forefront of everything we do.

CITIZENSHIP

We are dedicated to being good stewards in the communities we serve.

VIGILANCE

We will never waiver in our commitment to safety and preparedness in the fulfillment of our duties.

INNOVATION

We are driven to develop solutions that inspire progress.

OWNERSHIP

We are accountable for what we do and take pride in how we do it.

ONE TEAM

We respect each other and achieve together what no individual can alone.

OPERATING WITH INTEGRITY

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“Our Code of Conduct serves as the cornerstone of our commitment to legal and ethical decision making. Our adherence to its principles and spirit is critical to our success.”

Nick Loporcaro, GMR President and CEO

OVERVIEW: LIVING BY A CODE

EVERYONE, EVERYWHERE, ALL THE TIME!

As the leading national integrated air and ground EMS provider, our Guiding Principles are built on a foundation of high ethical standards and integrity. The Global Medical Response Business Code of Conduct and Ethics embodies those standards and is intended to guide our conduct at all times, allowing us to foster trust and respect in the communities we serve. The Code of Conduct applies to all GMR employees, directors and contractors as we fulfill our mission of providing care to the world at a moment's notice.

The Code is intended to be easily understood and provides guidance on specific standards of conduct that are fundamental to our business. It is intended to help you make lawful and ethical business decisions. But remember, it is only an overview. In many instances, a subject of the Code requires additional guidance; so, we have developed a set of comprehensive policies that are available in our GMR People Services (GPS) portal via Okta.

We are all responsible for understanding this Code and the policies that apply to our work activities. If you have questions, or are unclear regarding what course of action to take in a certain situation, contact the Ethics & Compliance Department by phone at 303.495.1265 or email at compliance@gmr.net.

KEEPING OUR COMMITMENTS, MAKING GOOD DECISIONS (WHY WE FOLLOW A CODE)

This Code sets the standards of conduct to which we all must adhere – our commitment to integrity and ethical and legal behavior. It provides the framework necessary to allow us to meet these commitments, which include:

- Complying with all laws, regulations, and Company policies governing our roles
- Being honest, truthful, fair and trustworthy
- Fostering an environment of safety for all of us and our patients
- Providing quality patient care and respecting patient rights and privacy
- Ensuring accuracy and completeness in our business and patient records
- Using good judgment and participating in our company culture, which values ethical conduct

SPEAK UP!

Compliance is a shared activity. We all have a duty to report promptly any suspected violation of the Code, company policies, laws, regulations or any other areas of concern. Speaking up is the right thing to do and is required by company policy. Reporting concerns helps us address issues objectively,

quickly and thoroughly. We take reported concerns seriously, handle them confidentially and investigate them fully.

Positive relationships and morale can best be achieved and maintained in a working environment where there is ongoing and open communication, which includes candid discussions of challenges and concerns. You are expected, and encouraged, to express concerns on any issue regarding potential violations of this Code, policies and procedures or applicable law. Remember, failure to do so could result in disciplinary action, up to and including termination of employment.



WHO TO CONTACT FOR SUSPECTED VIOLATIONS OR CONCERNS

- Your supervisor
- The Ethics & Compliance Department (by phone at 303.495.1265 or by email at compliance@gmr.net)
- The Ethics & Compliance Hotline, which is managed by a third party that can receive anonymous reports (24 hours a day, 7 days a week), toll-free at 877.631.5722 or by visiting www.globalmedicalresponse.ethicspoint.com
- Safety concerns can also be reported via the web-based safety reporting tool (available in Okta)

We prohibit retaliation against anyone who, in good faith, reports a suspected violation of the Code, policies, laws or regulations. Anyone, regardless of their position with GMR, who engages in retaliation will be subject to disciplinary action, up to and including termination of employment. Self-reporting your own violation does not insulate you from receiving disciplinary action, and disciplinary action in this circumstance is not considered retaliation.

Promotion of and adherence to this Code and related policies, including making reports as necessary, is considered an element of evaluating your job performance. Supervisors and leaders who receive reports of concerns must contact the appropriate department (e.g., Human Resources, Ethics & Compliance, or Safety) for guidance and assistance in reviewing the concerns. If you feel that a question or concern has not been properly addressed by a supervisor or another person in the chain of command, you must contact the Ethics & Compliance Department directly.

You have a duty to cooperate with any investigation of potential violations of the Code and other GMR legal matters, such as external investigations or lawsuits. This includes providing timely, accurate, truthful and complete information and documentation. Any confirmed violations of our Code, policies or law may result in discipline, including termination and possible legal action or referral to law enforcement.

For more information, please review the **Compliance Program** policy, and the **Duty to Report and Non-Retaliation** policy.

“By fostering a just culture, we create an environment where transparency, accountability, and continuous learning thrive. This foundation is essential for becoming a high reliability organization, where every team member feels empowered to speak up, learn from mistakes, and contribute to our collective success.”

Lisa Jacoba, Chief Human Resources Officer

SHARED ACCOUNTABILITY

We believe in the principles of high reliability, which recognize that humans do make mistakes. Consequently, we develop systems to capture error before it results in an untoward outcome. Highly reliable organizations operate in complex, high-hazard realms for extended periods without serious accidents or catastrophic failures.

LEVERAGING THE JUST CULTURE MODEL OF ACCOUNTABILITY

Highly reliable organizations create and foster a Just Culture, which is one of learning with an emphasis on shared accountability between the organization (which designs systems) and the individuals who work within those systems.

In a Just Culture:

- Shared accountability is a foundational tenet of managing risk:
 - The organization recognizes and is accountable for its role in building the systems team members work within
 - Team members are responsible for their own behaviors and choices made within the system, and for alerting the organization to system defects or weaknesses
- System reliability and resilience create the framework within which team members make decisions; when there is an incident, near-miss/close-call, or an unsafe condition identified, systems are reviewed and analyzed before assessing individual behavior
- Team members are treated equitably and fairly
- Transparency and reporting errors/voicing concerns, whether or not harm occurred, is everyone's duty
- Retaliation for reporting concerns in good faith is not tolerated
- Lessons learned are shared and process-improvement occurs, where appropriate, to mitigate future risk

ACCOUNTABLE, HIGH QUALITY PATIENT CARE

EVERYONE DESERVES QUALITY HEALTHCARE

We believe all patients deserve quality healthcare and we strive for clinical excellence in all patient encounters. We provide appropriate and quality care to patients and do not discriminate on the basis of race, color, national origin (including limited English proficiency), age, disability or sex (including pregnancy, sexual orientation, gender identity and sex characteristics).

We provide services to patients in accordance with their clinical needs and physical conditions and strive to be the best caregivers to all patients during what may be one of their worst days. Our clinical care providers seek to understand patient needs and conditions and to care for them with skill and compassion. We also are committed to our communities, family members, friends, our fellow responders and other healthcare providers. We value the principles of dignity, mutual respect, compassion and inclusion for all we encounter.

DELIVERING SAFE AND COMPLIANT CARE

Our clinical care providers have the training, experience and expertise necessary to meet the clinical needs of our patients and provide quality clinical services that are safe and compliant with all applicable laws, regulations and professional standards. They are required to maintain all necessary licenses and certifications.

We believe in the rights of our patients. As we would want for ourselves, our patients have the right to know the identity and qualifications of anyone who provides services to them and to participate in decision-making regarding their health care – including the right to refuse treatment (to the extent permitted by law) and to be informed of the consequences of such refusal. Patients have the right to voice complaints about the care and services provided and the right to receive information regarding our policies, procedures and charges. We honor the rights of our patients by maintaining and adhering to policies designed to safeguard these rights.

GMR strives for a culture of safe, quality patient care. This requires all clinical care providers follow applicable laws and regulations, including complying with the approved scope of practice for their licensure and/or certification levels. Clinical care providers also must comply with specific Patient Care Guidelines (PCG) approved by their designated medical directors.

“Patients literally trust us with their lives in their time of need. It’s our obligation and our privilege to provide them with the care we would want for ourselves.”

Ed Racht, MD,
Chief Medical Officer

“Fundamental to our success is maintaining vigilance when it comes to the safety of our patients and colleagues. This requires shared accountability between the organization providing strong safety management systems and colleagues who speak up if they have concerns.”

Ted Van Horne,
Chief Operating Officer

SAFETY ALWAYS

SAFETY STARTS WITH YOU

Patient care and operational safety are inextricably linked. Providing high-quality, timely, equitable and compassionate clinical care and transport is at the heart of everything we do. Managing complex risks in the clinical transport environment requires a concerted, intentional effort from organizational leadership and the organization as a whole and building systems that support frontline team members. The ability for emergency ground and air medical transport teams to provide high quality clinical care in a way that mitigates risks is the result of everyone in the organization working in concert.

This is achieved by building and maintaining a Safety Management System (SMS), which is a formal process to identify hazards and mitigate risk. We provide clear expectations through training, policy and procedures for our colleagues to understand and follow to ensure we operate with high regard for the safety of our colleagues, our patients and the communities we serve.

Safety is everyone's responsibility, and every team member has a voice. Creating a culture in which team members are treated respectfully and are heard is essential to safety and managing risks. When team members are comfortable speaking up and reporting incidents, near-misses/close-calls, unsafe conditions or errors – whether harm occurs or not – risks can be collaboratively mitigated. Colleagues are required to report safety concerns to their supervisors immediately, and we strongly recommend reporting through our web-based safety reporting tool available via Okta. Just like our Ethics & Compliance Hotline, colleagues can report concerns anonymously if they want, and the company prohibits retaliation against anyone who raises a concern in good faith.

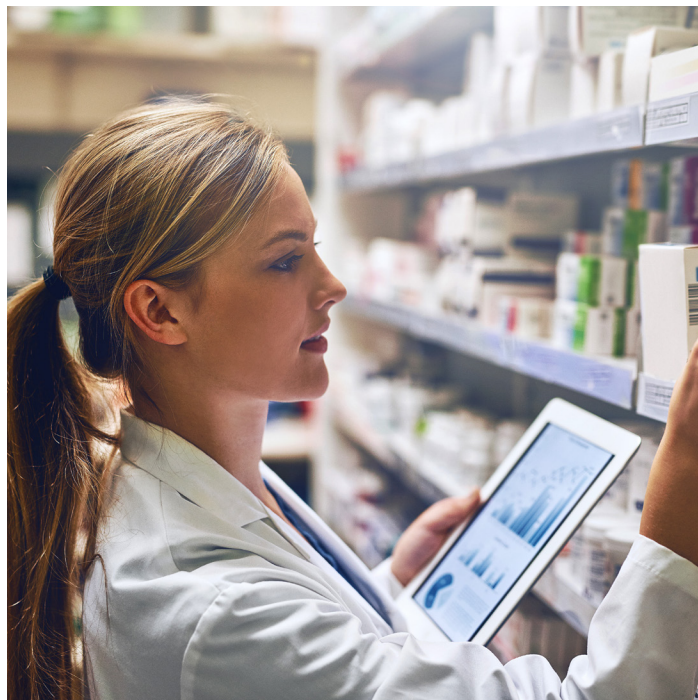
We maintain a safe and healthy work environment and follow all relevant safety regulations and guidelines, which are essential to quality patient care and to a safe workplace. We must all comply with workplace safety laws, regulations and rules as well as federal, state and local environmental regulations.

CONTROLLED SUBSTANCES

As a provider of emergency medical services, GMR uses controlled substances to care for and stabilize patients. While we respect individual privacy, we also recognize that substance abuse poses serious health and safety hazards in the workplace. Therefore, we have robust processes to manage the Company's controlled substances.

MANAGING OUR INVENTORY OF CONTROLLED SUBSTANCES

The handling and administration of controlled substances must comply with all regulatory requirements. As with all pharmaceuticals, controlled substances must be administered under an approved standing order or a written/verbal order in a manner consistent with local protocol and state scope of practice. Use of controlled substances in any manner inconsistent with protocol, rule or law is prohibited (including, but not limited to, diversion and tampering). All controlled substance transactions (inventory, administration, restock, etc.) must involve a minimum of two employees with both signing the appropriate records. Any discrepancy in controlled substance counts or records must be reported immediately to the on-duty supervisor. For more information on our controlled substances program, please see the **Controlled Substances Program Management** policy.



“Acting with integrity means we follow all laws, regulations and company policies and ask questions when we don’t know the right path. It means doing the right thing even when no one is looking and reporting concerns without fear of retaliation.”

Jennifer Mardosz,
Chief Compliance Officer

COMPLIANCE WITH LAW & COMPANY POLICIES

Having a compliance program is not only the right thing to do, it is an expectation of Federal and state governments and our business partners. Our compliance program is structured to ensure we follow applicable laws and regulations, including those that relate to government health care programs like Medicare and Medicaid, and to ensure compliance with our internal company policies.

This Code and our policies are fundamental to our compliance program. For more information about our expectations, please refer to the following policies: **Compliance Program, Duty to Report and Non-Retaliation, Preventing Fraud, Waste and Abuse** and the **GMR Employee Handbook**.

COMPLETE & ACCURATE BILLING PRACTICES

We are committed to honest and accurate billing practices and to compliance with federal and state laws prohibiting fraud and abuse. Knowingly presenting, or causing to be presented, a false or fraudulent claim to receive payment from the government is a violation of the Federal False Claims Act (FCA) and similar state laws. We take all reasonable steps necessary to maintain complete and accurate patient medical records that support clinical decision making and maintain robust processes to ensure the submission of accurate claims.

COMPLYING WITH LAWS & REGULATIONS

We comply with all applicable laws, regulations and standards governing the health care, EMS and aviation industries. This includes laws prohibiting bribery, kickbacks, and corruption and criminal laws that prohibit providing anything of value for the purpose of influencing patient referrals for services covered under a government health care program, which may implicate the Federal Anti-Kickback Statute (AKS) or similar state laws. Certain exceptions to AKS, known as safe harbors, allow financial arrangements with referral sources when certain standards are met.

GMR’s operations and services are conducted in accordance with the rules and regulations of the state EMS agencies that regulate us, and our air operations are subject to extensive regulation by the Federal Aviation Administration (FAA), including the Federal Aviation Regulations (FAR). Many FARs apply not only to the company but also to individuals. If applicable to your role and the services you provide, you are expected to follow all FARs and other similar governmental rules, regulations, orders or directives applicable to your duties and conduct as part of an air carrier’s operations. In addition, you must operate in accordance with our operation specifications issued by the FAA.

These are just a few of the relevant laws and regulations applicable to our company. Violations of these laws may result in civil penalties, criminal punishments, fines and/or exclusion from government health care programs. For more information, please review our **Overview of Relevant Health Care Laws** policy.



ANTI-CORRUPTION COMPLIANCE

GMR prohibits bribery, kickbacks or corruption of any kind, and complies with all laws governing foreign transactions, including the Foreign Corrupt Practices Act (FCPA). You may never give or offer anything of value to anyone for an improper purpose such as obtaining or retaining a business advantage.

You are also expected to maintain appropriate, professional boundaries with patients, their families and business partners. Giving or receiving gifts or entertainment (“business courtesies”) may be inappropriate or even illegal. Business courtesies (such as gifts, meals, entertainment, tickets, lodging and travel) may never be given, offered or accepted to improperly influence the decision of any person or business partner in connection with the Company’s business. Interactions with government officials are subject to increased scrutiny and more stringent rules under both U.S. and international law. Many governmental agencies have policies which prohibit the receipt of even very modest business courtesies.

Guidance regarding giving, offering or accepting business courtesies will depend on the specific facts and circumstances, so it is important for

you to review our **Business Courtesies** and **Anti-Corruption Compliance** policies. You can also contact the Ethics & Compliance Department with any questions.

ANTITRUST

GMR is committed to competing vigorously, honestly and in compliance with the letter and the spirit of antitrust laws, which are designed to promote a competitive economy in which companies can compete fairly. Compliance with these laws requires us to engage in honest and fair dealings and not anti-competitive, predatory or unfair practices.

Specific examples of anti-competitive conduct include things like price fixing and bid rigging and improper exchanges of competitively sensitive information. It is important to avoid discussions with competitors that may appear to restrain competition such as communications about rates, compensation, benefits or business territories. Exercise caution at industry conferences or when participating in industry projects as the exchange of competitively sensitive information can trigger antitrust considerations. For additional specific examples of prohibited conduct and more information, please familiarize yourself with the **Antitrust** policy or reach out to the Legal or Ethics & Compliance Departments.



WORKING WITH LOCAL, STATE & FEDERAL OFFICIALS

GMR engages in discussions with all levels of government on public policy issues and may work with government officials to provide information and perspective relevant to GMR’s business or

otherwise engage in public policy or legislative advocacy. We also routinely maintain or actively seek contracts to provide our services to government customers.

A number of state and local “pay-to-play” laws prohibit, limit or require disclosure of state or local campaign contributions from contractors (or certain of their employees) that do, or seek to do, business with a governmental entity. These laws exist to ensure contracting is not influenced by payments or gifts to government officials or political candidates. A violation of pay-to-play laws could result in GMR losing a valuable government contract as well as civil and criminal exposure. If you engage in activities with federal government officials, you must have pre-approval from the Government Affairs team, as there are requirements for tracking time and expenses related to these activities. For additional information, please review the **Political Activities** policy.



FINANCIAL REGULATIONS & ACCOUNTING RULES

GMR is committed to the integrity of its books, records and financial reporting. To ensure we maintain the accuracy of our books and financial records, you must:

- Use good business judgment in the processing and recording of all transactions
- Comply with generally accepted accounting principles, standards and practices, rules, and regulations and controls

- Promptly and accurately record accounting entries
- Fully cooperate with any internal or external audit related to the Company’s financial reporting or other financial information

If you have any good faith concerns about the Company’s accounting transactions, internal and external auditing matters, or any other financial reporting, please contact the Ethics & Compliance Department.

INELIGIBLE PERSONS

GMR maintains processes to ensure we do not knowingly employ or engage any individual or entity that has been denied, debarred or excluded through relevant sanctions or regulations, or who are otherwise ineligible for participation in federal or state health care programs. For additional information, please refer to the **Excluded or Debarred Persons or Entities** policy.

“Privacy protection is at the intersection of technology and ethics. Our shared responsibility to safeguard the privacy and security of personal information that is entrusted to our care is a cornerstone of our culture of trustworthiness, responsibility, and ethical behavior. Responsible use of information builds enduring trust within our community of patients, employees, members, partners and customers.”

Helenemarie Blake,
Global Privacy Officer

PERSONAL INFORMATION

LIVING PRIVACY

“Personal Information” is any information that can be used to identify an individual, directly or indirectly, and can include a broad range of data such as name, address, date of birth, health information and social security number. We are required to take all reasonable and appropriate steps to ensure the privacy and confidentiality of the personal information of our patients, members, applicants and employees.

HIPAA (the Federal Health Insurance Portability and Accountability Act) and similar state laws require health care providers, like us, to protect the confidentiality and security of patient’s protected health information (PHI) in any form. PHI is defined broadly as information created or received to identify a person that relates to their physical or mental health, treatment provided or payment for their care (including, for example, a patient’s social security number, name, address, digital identifiers, biometric elements and full-face images).

HIPAA protects patients’ rights to privacy and requires strict limitations on how information may be used and shared as well as how we share PHI with third parties. Similarly, many state laws require that we follow certain rules to ensure we approach the collection, use, and processing of the information of our patients, members and employees in a transparent and conscientious manner.

The protection and responsible use of Personal Information is part of the fabric of GMR culture. We are all expected to abide by applicable laws (federal, state or otherwise), GMR’s policies, privacy principles and any applicable contractual terms when collecting, using or disclosing Personal Information.

USE ONLY WHAT YOU NEED

One of the cornerstones of our privacy program is to use only the minimum necessary Personal Information to accomplish your task or goal. You may only use and disclose patient and Personal Information as required to do your job for a clinical or business purpose (i.e., for treatment, payment and health care operations). When using Personal Information for your job, make sure you are thoughtful about how you are using it and with whom you are sharing it; remember to check our rules and policies.

You also must use social media responsibly, ensuring your online behavior does not compromise patient privacy, confidentiality or GMR’s reputation. For additional information, refer to the **Social Media** policy. Always maintain our system security by protecting system passwords and exercising caution before clicking on external links in emails or otherwise. Immediately notify the Ethics & Compliance Department if you believe Personal Information has been lost, stolen, used or accessed inappropriately.

PROTECTING GMR ASSETS

CONFLICTS OF INTEREST

Conflicts of interest are outside interests, relationships or activities that a reasonable person would believe may have the potential to improperly influence, affect or conflict with GMR's interests. You may never use any non-public GMR information for personal gain or the gain of anyone else. We all have a duty of loyalty to GMR and an obligation to make sound business decisions that are not distorted or unduly influenced by personal, financial, family or other interests.

You must disclose any potential conflict of interest to the Ethics & Compliance Department prior to the potential conflict arising, or as soon as practicable after learning of the potential conflict. The Ethics & Compliance Department will assess the potential conflict and provide guidance on how to manage the activity and/or prohibit the actual or potential conflict. For more detailed information regarding conflicts of interest, please refer to the **Conflicts of Interest** policy.

GMR ASSETS

You have an obligation to safeguard GMR assets and to manage them appropriately. This includes exercising care when using company equipment and vehicles and reporting any instances of waste, misuse, destruction or theft of GMR property.

CONFIDENTIAL & PROPRIETARY INFORMATION

During the course of your work, you may be exposed to or entrusted with confidential, proprietary and private GMR information. Confidential information includes all information that is not readily available to the public and is maintained as confidential by GMR (for example, company trade secrets, proprietary business information, customer information and vendor information). You are all responsible for maintaining the confidentiality of the information with which you work and for keeping that information secure and accessible only to those who have rights to it, an obligation that continues after your relationship with GMR ends.

PROTECTING GMR SYSTEMS

Responsible use of technology is essential to protecting confidential information and patient information. You must safeguard GMR technology from damage, alteration, theft or fraudulent activity to prevent unauthorized access to and disclosure of GMR confidential information or patient information. Never share passwords or click on suspicious links and always use GMR approved applications and/or systems to conduct GMR work. GMR's robust cybersecurity measures are designed to protect electronic data from unauthorized access, breaches and other threats. Remember that cybersecurity is the responsibility of each GMR employee.

“At GMR, safeguarding our assets, maintaining confidentiality, and protecting our systems are essential to ensuring we can deliver exceptional care to our patients in their time of need.”

Jason L'Odense,
Chief Information Officer

EMBRACING TRANSPARENCY

GMR is committed to responding to and cooperating appropriately with all external audits, investigations or other requests. We also expect you to cooperate fully with all lawful requests from government agencies, which may include records requests, subpoenas, audits and regulatory investigations.

RESPONDING TO EXTERNAL AUDITS, INVESTIGATIONS OR OTHER REQUESTS

As a health care company, we are routinely audited by government agencies, and it is critical that we provide an appropriate and timely response. Often, there are abbreviated time limits in which to respond. We have routine processes for responding to these types of inquiries, which can vary by type of request. If you are unsure of these processes, and you are in receipt of an external audit, investigation or other request, immediately contact the Ethics & Compliance Department.

To the extent you have a role in responding to these inquiries, you have a duty to preserve any relevant company documents in anticipation of or after receipt of the audit, investigation or other request. You also have a duty to respond truthfully and never hide information from, or provide false information to, any auditor or investigator.

SEE SOMETHING, SAY SOMETHING

Remember, we all have a duty to ensure we are operating in a compliant way. If you see something, say something - promptly report any violation or suspected violation of the Code, company policies, law, regulations or any other areas of concern.

Suspected violations or concerns must be reported to one of the following:

- Your supervisor
- The Ethics & Compliance Department (by phone at 303.495.1265 or by email at compliance@gmr.net)
- The Ethics & Compliance Hotline, which is managed by a third party that can receive anonymous reports, (24 hours a day, 7 days a week) toll-free at 877.631.5722 or by visiting the GMR Ethics & Integrity Helpline at www.globalmedicalresponse.ethicspoint.com
- Safety concerns can also be reported via the web-based safety reporting tool (available via Okta)

Thank you for doing your part to ensure GMR is a safe and compliant place to work.



Global Medical Response®

PROVIDING CARE TO THE WORLD AT A MOMENT'S NOTICE