



## **CODE OF ETHICS & BUSINESS CONDUCT**

AdaptHealth Corp. (“AdaptHealth” or the “Company”) is committed to conducting business lawfully and ethically. This Code of Ethics and Business Conduct (hereafter referred to as “Code”) reinforces the Company’s commitment to the highest ethical and legal standards and provides each employee, officer, and director of the Company (hereafter collectively referred to as “Covered Persons”) with guidance and perspective in understanding business ethics at AdaptHealth. No code of conduct can hope to spell out the appropriate moral conduct and ethical behavior for every situation we may confront. In the final analysis, we rely on our own good judgment. Each Covered Person has the personal responsibility to make sure that, in discharging our duties and responsibilities as Covered Persons of AdaptHealth; we abide by this Code and applicable federal and state laws.

This Code establishes the general guidelines with which all Covered Persons must comply to ensure that their conduct conforms to the highest ethical standards and is in accordance with all applicable laws, rules, and regulations. These general guidelines are not meant to cover all situations. In cases when a Covered Person doubts the propriety of a situation, whether the situation is described within this Code, the Covered Person has an obligation to consult with a supervisor, the Corporate Compliance Department, and if necessary, the Company’s legal counsel. This Code is the core component of the Company’s overall Corporate Compliance Program.

Every Covered Person is required to understand and comply fully with both the rules and approval procedures established by this Code. The standards of conduct that govern AdaptHealth’s relationship with the government are applicable to each Covered Person whether the Covered Person is directly engaged in performing activities relevant to any federal, state, or private contracts. Any request for interpretation of, or an exception to, this Code is reviewed by the Corporate Compliance Department. Any Covered Person violating any provision is subject to disciplinary action, up to and including discharge from employment.

To the extent that any additional policies are developed as part of the Corporate Compliance & Ethics Program, those policies must be consistent with this Code. In case of any inconsistency, this Code shall govern.

### **Compliance with All Laws and Regulations**

All AdaptHealth Covered Persons are required to comply with all federal, state, and local laws and regulations. In addition, All Covered Persons are subject to the Company’s Insider Trading Policy relating to transactions in the Company’s securities and the securities of other companies. Covered persons are obligated to report any actual or perceived violation of an applicable law or regulation, this code, the Corporate Compliance Department, the Insider Trading Policy or any other AdaptHealth policy through the appropriate channels provided under the heading “How to File a Report” in this code.

## Confidential Information

All Covered Persons are responsible for ensuring that appropriate measures are taken to protect all AdaptHealth confidential (i.e., non-public) information. Covered persons are expected to assist in the protection of all confidential information, including technical, financial, customer, personnel, marketing, patient records, and other business information, which, if made available to AdaptHealth's competitors or the public, would be advantageous to such competitors and detrimental to AdaptHealth or subject the Covered Person and AdaptHealth to violations of the law. Protection of such information is critical to our ability to grow, operate, compete, and comply with all applicable laws.

This Code serves as AdaptHealth general reference document regarding confidential information and is to be used as such. However, AdaptHealth also provides additional published policies including but not limited to policies for HIPAA Privacy and Security Regulations, along with the Records Retention and Destruction Policy.

It is the duty of every Covered Person to protect the confidential information entrusted by the Company, regardless of its media form. For example, much of the information maintained in the Company computer systems is confidential, proprietary, and/or of a trade secret nature, and electronic transfer or copying of this information to a third party is generally prohibited.

Confidential information should be stored in a secure manner and its access limited to the Covered Persons who have a need to know and work with the confidential information.

Any request to release confidential information must be approved by the Chief Executive Officer or their designee.

## Dealing Honestly with Customers, Other Suppliers, & Consultants

**Quality of Service and Patient Safety** – AdaptHealth is committed to providing quality customer service and patient care that meets all federal and state expectations and AdaptHealth's quality standards.

**Professional Licenses** – AdaptHealth maintains all professional certifications and credentials required by AdaptHealth policy as well as federal, state, and local authority. Employees are expected to complete all requisite course work to maintain their professional certifications including, but not limited to attendance at live training sessions, competency training, course work, and written assessments as required.

**Current Certifications** – Employees in certain positions at AdaptHealth must maintain certifications specific to their field of work. Employees must provide evidence of current certifications applicable to their position. An employee who is required to maintain certifications as a condition of employment is prohibited from providing clinical care to

patients if they fail to maintain these required certifications. Employees or contractors not compliant with the policy are subject to disciplinary action up to and including termination of employment or contract.

**Contract Negotiation** – AdaptHealth has an affirmative duty to disclose current, accurate, and complete cost and pricing data where such data is required under appropriate federal or state law or regulation. Covered Persons involved in the pricing of contract proposals, or the negotiation of a contract must ensure accuracy, completeness, and currency of all data generated and given to supervisors and other Covered Persons and all representations made to customers, both governmental and commercial. Submitting false, incomplete, or misleading information, representations, quotations, statements, or certifications to the federal government or a customer can result in civil and/or criminal liability for AdaptHealth company, the individuals involved, and any supervisors who condone such practices.

**Competitive Analysis** – In conducting market analyses, AdaptHealth’s Covered Persons do not accept or use information known to be proprietary to one of our competitors. Covered Persons ensure that a competitor’s proprietary information is not improperly obtained or used in any improper fashion.

**Antitrust Issues** – The free enterprise system rests on the proposition that free and open competition is the best way to ensure an adequate supply of goods and services at reasonable prices. The antitrust laws of the U.S. are intended to protect and promote vigorous and fair competition. All Covered Persons adhere strictly to both the spirit and the letter of the antitrust laws of the U.S. and with all such laws governing competition in any country in which AdaptHealth does business. Violation of antitrust laws can result in severe civil and criminal penalties, including imprisonment for individuals, and AdaptHealth can be subjected to substantial fines and damage awards.

The following summary of antitrust law principles is intended to assist in the understanding of the basic antitrust regulations, and to recognize the types of business situations where these laws may be applicable. This summary is not intended to be a complete statement of all aspects and interpretations of the antitrust laws and cannot be regarded as a substitute for professional legal advice. Any question as to whether proposed course of action would involve a violation of the antitrust laws must be cleared in advance by the Corporate Compliance Department. Depending on the complexity of the situation, legal guidance may be obtained.

**Agreements with Competitors** – Contacts with competitors are sensitive and risky since courts can infer an agreement or collusion from such contacts when they are followed by common action or behavior. In all contact with competitors, Covered Persons avoid discussing prices, terms and conditions of sale, costs, inventories, competition, marketing plans or studies, production plans and capabilities, and any other proprietary or confidential information. Any conversation with a competitor that may involve the aforementioned topics must be pre-approved by the Chief Compliance Officer and General Counsel.

**Agreements with Customers** – A number of antitrust issues can arise in relationships between a company and its customers, especially if those customers are in the business of reselling any products or services sold or provided to the customer by the company.

In order to minimize the risk of violation of the antitrust laws or the appearance of violation in connection with dealing with customers:

1. Covered Persons deal fairly and openly with all AdaptHealth's customers and suppliers.
2. Covered Persons do not use coercive practices in any relationship with AdaptHealth's customers. Covered Persons never threatened termination for any reason other than good faith enforcement of AdaptHealth's contractual rights.
3. Covered Persons do not pressure suppliers to purchase AdaptHealth's services and products because AdaptHealth purchases their products and services.

**Trade Associations** – Trade associations provide a vehicle for industry members to meet and work together to improve the industry. However, trade associations have no exemption from the antitrust laws. If at a trade association meeting a matter is brought up that should be discussed with a competitor, it can be used by the government in providing an unlawful agreement or understanding. If competitively sensitive subjects come up during trade association meetings, Covered Persons ensure that their departure be noted in the minutes, and leave the meeting.

**Mergers, Acquisitions, and Joint-Ventures** – The antitrust laws also regulate business combinations, such as mergers, acquisitions, and joint-ventures. Before serious discussions or negotiations begin on any acquisition, regardless of structure, legal counsel is consulted and AdaptHealth makes the required filings with governmental agencies.

**Anti-Kickback and False Claims Issues** – Federal and state laws prohibit AdaptHealth and its Covered Persons from offering or accepting any form of remuneration, including a kickback, bribe, or rebate, directly or indirectly to an entity or person to induce that customer or potential customer (including physicians, hospitals, or other provider/suppliers) to purchase, lease, order, arrange for, or recommend services from or to refer a patient to AdaptHealth. In addition, there are laws that prohibit the filing of false and fraudulent claims, such as the Federal False Claims Act, to both governmental and private third-party payors.

Examples of the types of actions that could violate the federal Anti-Kickback Statute (the "Anti-kickback Statute") and similar state anti-kickback laws include the following:

1. Offering or paying anything of value to induce someone to refer a patient to AdaptHealth;

2. Offering or paying anything of value to induce someone to purchase services from AdaptHealth;
3. Soliciting or receiving anything of value for the referral of AdaptHealth patients; or
4. Offering free goods or services to induce the person or entity to purchase or order any items from AdaptHealth.

Questions involving the Anti-Kickback Statute and its relation to any existing or proposed financial relationship (including a contract, joint venture arrangement or marketing program) are directed to AdaptHealth's Chief Compliance Officer and General Counsel.

Examples of the types of actions that could violate the federal False Claims Act and other federal false billing laws include:

1. Filing a claim for services that were not rendered at all or were not rendered as described on the claims form;
2. Filing a claim for services that were rendered, but were medically unnecessary;
3. Submitting a claim containing information you know to be false; or
4. Falsifying documentation in support of a claim, including, for example, certificates of medical necessity; or
5. Assisting a customer in submitting a false or fraudulent claim; or
6. Misusing Social Security or Medicare symbols, emblems, or names in marketing.

**Providing Business Courtesies to Customers or Sources of Customers** – AdaptHealth's success results from providing the highest quality of patient care, ethical standards, and integrity with outstanding customer support services.

AdaptHealth does not seek to gain an improper advantage by offering business courtesies such as entertainment, meals, transportation or lodging to potential referral sources or purchasers of any items or services furnished by AdaptHealth. In light of the Anti-Kickback Statute and other federal and state laws, Covered Persons do not offer any type of business courtesy to a referral source or purchaser for the purpose of obtaining favorable treatment or advantage or to induce such persons or entity to purchase or order any items or service from AdaptHealth. Business courtesies of any amount offered, provided, or solicited as an inducement to refer patients or business, or as a reward for such referrals are prohibited.

To avoid even the appearance of impropriety, other than pre-approved functions, Covered Persons do not provide any referral source or purchaser with any gifts, meals, or promotional items with a value greater than \$50 without the express approval of AdaptHealth's Chief Compliance Officer or General Counsel. Any Covered Person may provide or pay travel or lodging expenses of a customer or potential referral service only with the advance approval of the Chief Compliance Officer or General Counsel

**Stark Law** – The federal Stark Law or Physician Self-Referral law prohibits a physician or their immediate family members from referring a Medicare or Medicaid beneficiary to any entity providing designated health services if they have a financial relationship with the entity. Similar state laws apply to private and third-party payors. AdaptHealth does not currently have any physician referral ownership. Any request made by a physician referral source or their immediate family members, are escalated to the Chief Compliance Officer or General Counsel for consideration.

**Government Health Care Program Agreements** – On a regular basis, AdaptHealth is a party to agreements with governmental health care programs such as the Medicare or Medicaid programs. It is essential that all Covered Persons are knowledgeable of, and comply with, all the applicable laws, rules and regulations of all such governmental agencies. Billing personnel must also comply with AdaptHealth’s Corporate Policy on Reimbursement and Billing Guidelines. Any Covered Persons who may have a concern or a question concerning compliance with any governmental contract or subcontract consult with their supervisor or the Chief Compliance Officer.

**Foreign Corrupt Practices Act** – Covered Persons who do business in foreign countries often become aware of customs involving the exchange of gifts or the paying of certain fees. It is AdaptHealth’s policy to comply with applicable laws on these matters, particularly the Foreign Corrupt Practices Act. This law restricts payments to officials of foreign government, political parties, and candidates for office. Generally, “illegal payments” are any bribes, commissions, rebates, kickbacks, consulting or other service fees, special where it is known, or reasonable suspected, that the payment or transfer is to reward a foreign official for obtaining or retaining business for AdaptHealth. Payments made to foreign officials are equally illegal when made through an intermediary or consultant, rather than directly.

Whenever an independent commission agent, sales consultant, or a similar representative is retained with respect to any business outside the U.S., a written commission agreement specifically approved by the chief Compliance officer or General Counsel is signed by an authorized member of AdaptHealth senior management and by the representative . Negotiating and approving these arrangements are performed with care, and there is full disclosure to the Chief Compliance Officer or General Counsel of all facts and circumstances.

Ultimately, each Covered Person exercises good business judgment in deciding which situations are unacceptable. Bottom line: if there is ever any doubt as to the acceptability of any gift or entertainment activity, Covered Persons consult with their supervisor, the Chief Executive Officer, the Chief Compliance Officer, or the General Counsel.

**Exclusion Act** – It is the policy of AdaptHealth to not knowingly employ, contract with, or otherwise do business with any individual or entity which has been excluded, debarred, suspended, or is otherwise ineligible to participate in State or Federal healthcare reimbursement programs or convicted of a criminal offense as identified in



42 U.S.C§ 1320a-7, related to healthcare. AdaptHealth will make reasonable inquiries into the background of prospective employees, vendors, referral sources, and independent contractors whose job function or activities may materially impact AdaptHealth's compliance with Federal or state law or the Corporate Compliance & Ethics Program.

AdaptHealth screens all persons and entities upon hire and at least monthly to determine whether they have been listed as ineligible for Federal program participation and will immediately terminate the employment or contractual arrangement with the individual or entities to which the exclusion applies.

## **Financial Integrity**

**Business Financial Recording** – AdaptHealth requires honest and accurate recording and reporting of financial information in order to make responsible business decisions. All financial books, records, and accounts must accurately reflect transactions and events and conform to generally accepted accounting principles and to AdaptHealth's system of internal controls. It is the policy of the Company to provide full, fair, accurate, timely, and understandable disclosure in reports and documents filed with, or submitted to, the SEC and in other public communications.

**Avoiding Abuses of Trust** – AdaptHealth expects its Covered Persons not to engage in any activity that might interfere, detract, or conflict, or appear to interfere, detract, or conflict, with AdaptHealth's best interest of the interests of AdaptHealth's customers or suppliers.

**Conflicts of Interest** – All Covered Persons have a responsibility to avoid situations and relationships that involve actual or potential conflicts of interest. Generally, a conflict of interest arises whenever a Covered Person's personal interests diverge from his or her responsibilities to AdaptHealth or from AdaptHealth's best interests. Put another way, a conflict of interest is created whenever an activity, association, or relationship of a Covered Person might impair independent exercise of judgment in the Company's best interest.

**Personal Conflicts of Interest** – Direct reporting or co-working relationships involving relatives or significant others in any capacity, whether by contract or through an outside service agency, may create conflicts of interest potentially harmful to both the Company and the Covered Persons involved and are generally discouraged. These situations, and others like them, where loyalties to AdaptHealth could be comprised, must be avoided. Covered Persons who believe they are involved in a potential conflict of interest have a responsibility to discuss it with their supervisor or the Legal Department.

**Media and Investor Inquiries** – This prohibition applies specifically, but is not exclusive to, inquiries about the company, which may be made by the media, or non-Company attorneys. All such communications on behalf of the company are made only through an appropriately designated individual under carefully controlled

circumstances. If a Covered Person receives any inquiry related to the company, whether from the media, a non-Company attorney or otherwise, the covered Person declines comments and refers the inquiry to either the Communications Department or the Legal Department.

**Government Proprietary and Source Selection Information** – AdaptHealth does not solicit, not receives any sensitive proprietary internal government information, including budgetary, program or source selection information, before it is available through normal processes.

**Insider Trading** – “Insider trading” refers generally to buying or selling a security, in breach of a fiduciary duty or other relationship of trust and confidence, while in possession of material, nonpublic information about the security. Insider trading violations may also include “tipping” such information, securities trading by the person “tipped”, and securities trading by those who misappropriate such information.

The scope of insider trading violations can be wide-reaching. The Securities and Exchange Commission (the “SEC”) has brought insider trading cases against corporate officers, directors, and employees who traded the corporation’s securities after learning of significant, confidential corporate developments; friends, business associates, family members, and other “tippees” of such officers, directors, and employees who traded the securities after receiving such information; employees of law, banking, brokerage, and printing firms who were given such information in order to provide services to the corporation whose securities they traded; government employees who learned of such information because of their employment by the government; and other persons who misappropriated and took advantage of confidential information from their employers.

An “insider” can include officers, directors, major stockholders, and employees of an entity whose securities are publicly traded. In general, an insider must not engage in transactions in the securities of that entity for personal gain if that person possesses material, nonpublic information about the entity. In addition, an insider who is aware of material, nonpublic information must not disclose such information to family, friends, business or social acquaintances, employees, or independent contractors of the entity (unless such employees or independent contractors have a position within the entity given them a clear right and need to know and a duty to keep such information strictly confidential), and other third parties.

**Related Party Transaction** – A Related Party Transaction is any transaction directly or indirectly involving any Related party that would need to be disclosed under 404(a) of Regulation S-K. Under item 404(a), the Company is required to disclose any transaction occurring since the beginning of the Company’s last fiscal year, or any currently proposed transaction, involving the Company where the amount involved exceeds \$120,000, and in which any related person had or will have direct or indirect material interest. “Related Party Transaction” also includes any material amendment or modification to an existing Related Party Transaction.



Related Party Transactions will be brought to management and the Board's attention. Each of the company's directors and executive officers shall inform the Chairperson of the Committee of any potential Related Party Transactions. In addition, each such direct and executive officer shall complete a questionnaire on an annual basis designed to elicit information about any potential Related Party Transactions.

Any potential Related Party Transactions that are brought to the Committee's attention shall be analyzed by the Committee, in consultation with outside counsel or members of management, as appropriate, to determine whether the transaction or relationship does in fact, constitute a Related Party Transaction requiring compliance with AdaptHealth Related Party Transactions policy.

## **Discrimination and Harassment**

AdaptHealth strives to maintain a healthy, safe, and productive work environment which is free from discrimination or harassment based on race, color, relation, national origin, age, gender, sexual orientation, or disability, or other factors that are unrelated to AdaptHealth legitimate business interests. AdaptHealth will not tolerate sexual advances, actions, or comments or racial or religious slurs, jokes or any other comments or conduct in the workplace that create, encourage, or permit an offensive, intimidating, or inappropriate work environment.

## **Culture of Ethics and Compliance**

Ethical considerations are at the heart of every interaction at AdaptHealth, from the treatment plans we develop to the way we communicate with patients and their families. By fostering a culture of ethics, we ensure that our actions are guided by principles of fairness, respect, and compassion. This not only enhances the quality of care we provide but also strengthens the bonds of trust between our organization and the communities we serve.

Creating a culture of ethics and compliance is not a one-time effort; it is an ongoing commitment. We invest in continuous training and development programs to ensure that our employees are well-versed in ethical decision-making and compliance practices. Our Corporate Compliance team conducts analytics to identify and mitigate ethics and compliance risks. We encourage open communication and provide avenues for employees to voice their concerns without fear of retribution. This open and transparent environment encourages a sense of collective responsibility and reinforces our commitment to integrity.

## **Reporting Violations and Discipline**

Your conduct can reinforce an ethical atmosphere and positively influence the conduct of fellow employees. You must proactively promote ethical behavior as a responsible employee or officer among those people in your work environment. If you are powerless to stop suspected misconduct or discover it after it has occurred, you must

report it to the appropriate level of management at your location. Misconduct cannot be excused because it was directed or requested by another. In this regard, you are expected to alert management whenever an illegal, dishonest, or unethical act is discovered or suspected.

Strict adherence to this Code is vital. Supervisors are responsible for ensuring that Covered Persons are aware of and adhere to the provisions of this Code. For clarification or guidance on any point in this Code, please consult the Corporate Compliance Department.

Covered Persons who are aware of or suspect a violation of this Code or other irregularities are expected to report these alleged violations as quickly as possible but in all events within five (5) working days.

Reports can be made through the appropriate channels provided under the heading “How to File a Report” listed below. Covered Persons will not be disciplined or otherwise retaliated against as a result of report such conduct.

Upon receipt of credible reports of suspected violations or irregularities, the Compliance Department shall immediately begin a detailed investigation and take corrective action where appropriate. Violations of this Code may result in discipline ranging from warnings and reprimand to discharge, or where appropriate, the filing of a civil or criminal complaint. Disciplinary decisions will be made by operational management in accordance with the AdaptHealth Corrective Action Plan and are subject to review by the Corporate Compliance Officer, General Counsel and VP of Human Resources.

Covered Persons will be informed of the charges against them and will be given the opportunity to state their position before disciplinary actions are imposed.

**Consequences of Noncompliance** – Any person who ignores or violates this Code or any of the Company’s ethical standards or other policies, including failures to report potential violations by others, will be subject to disciplinary action, up to and including termination of employment.

**Retaliation** – Any person who takes any action in retaliation against any Covered Person who has in good faith raised any question or concern about compliance with this Code will be subject to serious sanctions, which may include dismissal for cause. If you suspect that you or someone you know has been retaliated against for reporting possible misconduct, you should immediately contact your supervisor, manager, Human Resources representative, the Corporate Compliance Department, or the anonymous AdaptHealth Hotline at 1-844-256-8560.

**Waivers** – In general, the granting of waivers is discouraged. Any Covered Person who believes that an exception to any of these guidelines is appropriate should contact his or her immediate supervisor. The supervisor must bring such requests to the attention of the Compliance Department promptly. Any waiver must be granted in

writing. All waivers for the principal executive officer, principal financial officer, principal accounting officer, or controller, persons performing similar functions, or any other executive officers, and all waivers for directors, must be granted by the Governing Body.

## **How to File a Report**

Covered Persons have many options for seeking compliance advice or reporting misconduct. Covered Persons can directly contact their supervisor, manager, Human Resources Department, or the Corporate Compliance Department.

Additionally, suspected violations may be reported through the Company's confidential and anonymous Compliance Hotline at 1-844-256-8560. The hotline is screened through a third-party hotline service to ensure confidentiality and anonymity. In addition to this policy, the phone number, email address, and web address for the hotline can be found on the Company's intranet site, on posters hanging in common areas, or other employee communications located throughout the workplace.

## **Limitation on Effect of code of Ethics and Business Conduct**

Nothing contained in this Code, or the Corporate Compliance & Ethics Program is to be construed or interpreted to create a contract of employment, either expressed or implied, nor is anything contained in this Code intended to alter a person's status of employment with AdaptHealth or collective bargaining agreements if applicable.

## **Reservation of Rights**

AdaptHealth reserves the right to amend this Code and the Corporate Compliance & Ethics Program, in whole or in part, at any time and solely at its discretion.

## **Questions and Reporting**

1. Covered Persons with questions regarding this Code are expected to contact their manager, supervisor, or the Corporate Compliance Department.
2. Covered Persons are responsible for promptly reporting any suspected violations of this policy to the corporate compliance Department or the AdaptHealth Hotline at 1-844-256-8560.
3. Covered Persons are assured they can report any potential non-compliant activities, including participation in investigations, without fear of retaliation or reprimand.