ATI PHYSICAL THERAPY

ALWAYS THINK INTEGRITY

2017 Code of Conduct and Compliance Program Guide

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"Integrity is making sure that the things you say and the things you do are in alignment."

– Katrina Mayer

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"A few people of integrity can go a long way."

– Bill Kauth

A Message from Dylan Bates, CEO and Lynn McGivern, CCO

ATI's Commitment to Uncompromising Integrity

Long before compliance polices were required by the industry, ATI has a long history of being a leader in developing and promoting strong professional ethics. Our values form the foundation of how we work with each other, our customers, patients, and competitors. Ethical behavior, honesty and adherence to laws and regulations are the hallmarks of how we have always operated. This is an absolute at ATI. There is no room for compromise.

Due to the fact that today's healthcare environment is more complex and answers are not always straightforward, the ATI Compliance Program Guide is your compass for this dynamic industry, always pointing you due north. The ATI Compliance Program Guide establishes a shared vision of standards and practices for the organization, in one clear and concise document. These principles will be a consistent guide to follow in our daily jobs and interactions.

Although it is important to grow our business, we cannot do so by compromising our standards and the foundation of our organization. In fact, as the industry leader, we must go a step further and avoid even the appearance of any impropriety. We expect all team members to review these standards and make them a living part of the organization. Our continued success relies on our team members conducting business with integrity every day.

If you see a fellow team member or a situation that does not live up to the ATI standards, we encourage you to report it so it can quickly be investigated and resolved. You can report your concern anonymously or you can provide your contact information so we can follow-up with you, if necessary. In either case, your information will be treated confidentially to the extent possible. There is never any retribution or reprisals for making a report in good faith.

Every time you report a concern regarding a violation of our Code of Conduct and Compliance Program Guide, you are making a difference for everyone at ATI Physical Therapy and you have our full support and appreciation.

In closing, let's ensure that ATI's values drive every decision and action we do on behalf of our patients and fellow team members. Let's never forget that honesty, integrity, compliance with laws and regulations represent the DNA of ATI's Code of Conduct and Compliance Program Guide. Thank you for your continued support of the ATI Compliance Program. We look forward to working with each of you to uphold our commitment to Always Think Integrity.

Dylan Bates, CEO
ATI Holdings, LLC

Lynn McGivern, CCO
ATI Holdings, LLC

Introduction to Code of Conduct and Compliance Program

ATI recognizes the need to conduct business with honesty and integrity and in compliance with all applicable federal and state laws and payor requirements. This recognition is supported by an organizational commitment to promote ethical and compliant business operations through the implementation of a systematic plan. ATI is committed to conducting its business according to the highest standards of honesty and fairness. This commitment to observing the highest ethical standards is designed to ensure compliance with applicable laws and regulations in the various jurisdictions where we operate, and to earn and keep the continued trust of our patients, clients, shareholders, personnel and business partners.

ATI has established a Code of Conduct and Compliance Program to reinforce its dedication to compliance and assist its employees, management team, and affiliates in complying with federal and state laws while conducting business in an ethical manner.

Employees and contracted staff of all organizations owned or controlled by ATI Holdings, LLC ("ATI") (referred to together in this Compliance Program Guide as "we," or "us) are responsible for conducting business operations in accordance with the contents and policies and procedures herein.

We have created a culture of compliance that demands teamwork and leadership to execute on our commitment to **Always Think Integrity**. To promote a workplace that values integrity, honesty, and compliance with the law, all employees must be informed and abide by these standards of conduct. The Code of Conduct and Compliance Program are designed to assist ATI employees and others to address and resolve issues of ethics, compliance and appropriate conduct in the workplace.

ATI will make available our Code of Conduct and Compliance Program Guide to every employee, business associate and affiliate and in doing so the following obligations are created:.

- Understand that I am to read and become familiar with the contents of the Program Guide as it outlines the Company's commitment to compliance, policies and my responsibilities.
- Employees are responsible for reading the Code and all updates published.
- Employees must acknowledge the code by attesting in writing or electronically that they understand that they are to read and become familiar with the contents of this Code of Conduct and Compliance Program Guide upon hire and/or as periodically required by Company.
- An individual's acknowledgment reflects a commitment that one has read, understands, accepts, abides, and participates in the Compliance Program.

ATI is committed to regular reviews of the Code of Conduct and Compliance Program; both will be updated as necessary and ensure that employees have access to information regarding any modifications or changes. This Compliance Program Guide is not intended to be an exhaustive guide to all the detailed rules and regulations governing the services provided by ATI. Rather, it is intended to establish guiding principles and corporate-wide policies to ensure that each ATI employee has a common vision of ATI's ethical standards, and operates in accordance with those standards.

The Code of Conduct and Compliance Program provide a comprehensive set of standards for appropriate workplace and related conduct. ATI has established policies and procedures, such as those related to billing, coding and other policies contained within the Employee Handbook that supplement and support the standards set forth herein. Should there be a perceived conflict or discrepancy between the Employee Handbook and the Code of Conduct, the Code of Conduct will take precedence. While the Code of Conduct and Compliance Program Guide are intended to serve as guidance, they cannot address every situation that an ATI employee or affiliate may encounter. Therefore, ATI expects its employees and affiliates to exercise personal integrity and good judgment in every instance, whether specifically addressed or not.

The Guide establishes minimum standards to be observed by all ATI and affiliated employees, independent contractors, consultants, board members and investors. In order for ATI to adopt and implement its Compliance Program, we have established a Compliance Committee and have designated a Chief Compliance Officer. The Compliance Committee is responsible for approving the Compliance Program Guide and any amendments or revisions thereof. The Chief Compliance Officer has been given the authority to direct and oversee all aspects of the ATI Compliance Program.

Annually, ATI will review key areas of potential compliance risk and set forth a system to identify risk elements in each key area. The annual risk assessment will take into consideration the annual work plans published by the Office of Inspector General of the Department of Health and Human Services, industry guidance as provided by the American Physical Therapy Association, American Occupational Therapy Association and the Health Care Compliance Association, in addition to internal and external auditing and monitoring results.

"Whoever is careless with the truth in small matters cannot be trusted with important matters."

– Albert Einstein

Employee Obligation to Report

ATI strongly espouses an ethical work environment on all levels and requires our employees, affiliates and independent contractors to conduct business with integrity, and in full compliance with laws, regulations and our own operating policies and procedures. All ATI Physical Therapy personnel have a duty to protect the integrity of our company by reporting reasonable concerns of non-compliance in the workplace. If you encounter any situation that you believe may be a violation of company policy or the guidance provided herein, you should without hesitation contact your immediate supervisor, a member of the management team, the Chief Compliance Officer; or you may call the ATI Compliance Hotline or email the Compliance Department.

ATI established the reporting hotline to enable you to report your concerns in an anonymous manner. This hotline may be used to report a variety of ethical, integrity, safety, security and compliance concerns. The objective of the Compliance Hotline is to provide a way for employees to communicate their concerns regarding compliance issues and report instances of suspected non-compliance in a manner that helps preserve confidentiality and assure non-retaliation. However, calls to the Compliance Hotline do not protect callers from appropriate disciplinary action regarding their own performance or conduct. In submitting a report or contacting the Hotline, you may remain anonymous or you may choose to identify yourself and provide contact information so that we can reach out to you directly if additional details are needed. In either case, your report will be kept confidential to the extent practical. It's not always possible to guarantee absolute confidentiality in all cases. Disclosure within or outside ATI may be required by law, or may be necessary in order to enforce ATI policies.

"A quiet conscience makes one strong!"

– Anne Frank

Whistleblower Protection Act of 1989

ATI will not retaliate against any person for making a good faith complaint under this policy, regardless of the outcome of the investigation. Similarly, ATI will not retaliate against any person (other than someone who is found to have violated this policy) for providing truthful information in connection with an investigation under this policy in any respect. Any employee of ATI who retaliates against another employee for utilizing in good faith the procedures in this policy will be subject to discipline, up to and including termination.

Any employee who becomes aware of retaliation against anyone for exercising his or her rights under this policy, must immediately report such conduct using the complaint procedure set forth above.

Confidential Compliance Reporting Resources

ATI PT Compliance Hotline: 800-428-1678

ATI PT Compliance Email: compliance@atipt.com

The ATI Physical Therapy Code of Conduct and Compliance Program Guide are applicable to all employees regardless of position or title. Failure to adhere to program guidance, code of conduct, applicable laws, rules and regulations may subject you to discipline in accordance with the disciplinary policy as outlined in the Employee Handbook, up to and including termination. Any colleague who deliberately makes a false accusation with the purpose of harming or retaliating against another colleague, will be subject to disciplinary action in accordance with ATI policy.

Creating a Culture of Compliance

Creating a culture of compliance begins with embracing ATI's Mission and Values.

Our Mission

MISSION

To ***exceed*** *customer expectations by providing the* ***highest quality of care*** *in a* ***friendly*** *and* ***encouraging*** *environment.*

Our Core Values

- Communication
- Teamwork
- Friendly Factor
- Quality of care

Our Values provide the foundation for our growth, development and strategy, and support our culture of compliance. Your individual commitment to these Values is fundamental to our company's continued success.

ATI Physical Therapy expects employees to act in a manner that is consistent with our Core Values, Code of Conduct, Compliance Program Guide, and in compliance with applicable law.

Your Responsibilities

- Understand and carryout the Compliance Program, Mission and Core Values in daily job duties.
- Demand the same of your colleagues.
- Report concerns promptly.
- Ask questions.

Leadership Responsibilities

- Reinforce and execute ATI's Compliance Program and Core Values, and apply them in the daily duties of yourself and your team.
- Empower your staff to ask questions.
- Demonstrate your commitment to Always Think Integrity.
- Create an environment where there is zero tolerance to compromising our culture of compliance.

Understand that our long term success depends on executing on our Mission and Core Values with uncompromising integrity. As a shared vision and goal, there are resources available to assist you and your staff in making the right decisions.

Board Members and Executive Management Responsibilities

A Board must act in good faith in the exercise of its oversight responsibility for its organization, including making inquiries to ensure:

- Corporate information and reporting system exists.
- The reporting system is adequate to assure the Board that appropriate information relating to compliance with applicable laws will come to its attention in a timely manner and as a matter of course.

The existence of a corporate reporting system is key to ATI's Compliance Program. It keeps the Board informed of the activities of the organization, and also enables us to evaluate and respond to issues of potentially illegal or otherwise inappropriate activity as quickly as possible. Compliance is an enterprise-wide responsibility. While audit, compliance, and legal functions serve to advise, evaluate, identify and monitor risk and compliance, it is the responsibility of the entire organization to execute our Compliance Program.

OVERVIEW OF LAWS AND REGULATIONS

Five FACES of Compliance

There are many, laws, regulations and standards that govern the daily operations and professional conduct of ATI Physical Therapy and all of its service lines. ATI has developed guidelines, policies and procedures, as well as training to support our Mission and Values, each of which individually and collectively ensure that ATI employees and affiliates operate in a manner that is consistent and compliant with applicable legal requirements. This Code of Conduct and Program Guide will be reviewed regularly to incorporate regulatory changes.

False Claims Act

This law prohibits the submission of false or fraudulent claims to the government and represents a great risk to healthcare providers in all venues of care. It is often implicated in the event of penalties under both Stark and the Anti-kickback Statute, compounding the financial liability that organizations that fail to comply with are subject to. Federal law imposes financial penalties against any person or entity that knowingly submits or causes to be submitted:

- A claim that the person knew or should have known was false or fraudulent.
- A claim for an item or service that the person knew or should have known was not provided as claimed.
- A claim that the person knew or should have known was provided by an individual who was not otherwise qualified or was excluded from participating in the federal healthcare programs.
- A request for payment in violation of conditions of participation of the federal healthcare programs or other healthcare compliance laws.

Civil penalties for violating the FCA can include fines of $10,781.40-$21,562.80 per false claim, and up to three times the amount of damages sustained by the government as a result of the false claims.

There is also a criminal FCA statute by which individuals or entities that submit false claims can face criminal penalties.

Anti-Kickback Statute (AKS)

The AKS makes it a criminal offense to knowingly and willfully offer, pay, solicit or receive any remuneration, directly or indirectly, to induce or reward referrals of items or services reimbursable by a federal healthcare program. If certain types of arrangements satisfy regulatory safe harbors, the AKS will not treat these arrangements as offenses. It is ATI's policy to fully comply with the requirements of the Federal Anti-kickback Statute, and to structure its business relationships with actual or potential referral sources to satisfy the applicable safe harbor regulations.

Civil Monetary Penalties Law (CMPL)

Under the CMPL, Civil Monetary Penalties (CMPs) apply for a variety of misconduct. The CMPL authorizes penalties of up to $50,000 per violation, and assessments of up to three times the amount claimed for each item or service, or up to three times the amount of remuneration offered, paid, solicited or received. Violations that may give rise to CMPs include presenting a claim that you know or should know is for an item or service not provided as claimed or that is false and fraudulent; presenting a claim that you know or should know is for an item or service for which Medicare will not pay; and violating the AKS.

Exclusions Statute

Under the Exclusion Statute, the Office of Inspector General (OIG) must exclude from participation in all federal healthcare programs providers and suppliers convicted of Medicare fraud; patient neglect or abuse; or felony convictions related to fraud, breach of fiduciary duties, or other financial misconduct related to healthcare service delivery.

The OIG also has the discretion to impose exclusions on a number of other grounds. Excluded providers cannot participate in federal healthcare programs for a designated period. An excluded provider may not bill federal healthcare programs for services he or she orders or performs. ATI will not knowingly employ, contract with or accept referrals from an individual who has been excluded from participating in federal healthcare programs.

"If you don't know where you are going, you'll end up someplace else."

– Yogi Berra

Stark Law

The Physician Self-Referral Law, often called the Stark Law, prohibits a physician from making a referral for certain designated health services (which include home health services, occupational therapy and physical therapy) to an entity in which the physician (or member of his or her immediate family) has an ownership/investment interest or with which he or she has a compensation arrangement, unless an exception applies. If certain types of arrangements satisfy regulatory exceptions, the Stark law will not treat these arrangements as offenses. Penalties for physicians who violate the Stark Law include fines, repayment of claims, and potential exclusion from participation in all federal healthcare programs. It is ATI's policy to fully comply with the requirements of the Stark Law and to structure its business relationships with actual or potential referral sources to satisfy the applicable exceptions. All proposed relationships involving referral sources including but not limited to physicians, dentists, chiropractors, osteopathic physicians must be reviewed and approved by both the General Counsel and Chief Compliance Officer or their respective designee.

KEY ELEMENTS OF ATI'S CODE OF CONDUCT AND COMPLIANCE PROGRAM

ATI's Compliance Program has been established to aid ATI Physical Therapy and its affiliates in satisfying the requirements of an effective Compliance Program as set forth under the Federal Sentencing Guidelines. The guidelines offer incentives to organizations to reduce and ultimately eliminate criminal conduct by providing a structural foundation from which an organization can self-police its own conduct through an effective Compliance Program. The United States Sentencing Commission defines a Compliance Program as a "program that has been reasonably designed, implemented and enforced so that it generally will be effective in preventing and detecting criminal conduct." The prevention and detection of criminal conduct, as facilitated by an effective Compliance Program will assist ATI in encouraging ethical conduct and in complying fully with all applicable laws.

In recent years the United States Sentencing Commission modified the Federal Sentencing Guidelines, including the standards for an effective Compliance Program as identified and overseen by the Office of Inspector General (OIG). The OIG embarked on a major initiative to engage the private health care community in preventing the submission of erroneous claims and in combating fraud and abuse in the Federal health care programs through voluntary compliance efforts. As part of that initiative, OIG has developed a series of Compliance Program Guidance directed at the healthcare industry. Our Compliance Program has incorporated the recommended elements and relies on information provided by the OIG and CMS for training and implementation purposes.

"Waste no more time arguing about what a good man should be. Be one."

–Marcus Aurelius, Meditations

ELEMENTS OF AN EFFECTIVE COMPLIANCE PROGRAM

1. Standards of Conduct, Policies and Procedures

In order to have an effective Compliance Program, an organization must have a Code of Conduct (or similarly named document) that sets forth the organization's commitment to compliance. Additionally, organizations should develop detailed policies and procedures that address areas of risk and vulnerability, and which are designed to detect and prevent violations of the law, as well as encourage education, monitoring and remediation when necessary. ATI's Code of Conduct and Compliance Program Guide provides a standard framework, culture and expectation by which the company shall carry out its operations and service lines. The Code of Conduct and Compliance Program Guide should describe the expectations that all employees conduct themselves in an ethical, compliant manner; that employees are empowered to raise issues of noncompliance appropriately; and that reported issues will be addressed and resolved in a timely manner. ATI's policies should incorporate the elements of an effective Compliance Program and should serve as a guide to the Chief Compliance Officer, Compliance Committee, Executive Management, and all employees in fulfilling their duties and responsibilities to ATI's Compliance Plan and Program.

2. Chief Compliance Officer and Compliance Committee

ATI has designated a Chief Compliance Officer and Compliance Committee. The duties of the Chief Compliance Officer include working with the Compliance Committee to personally oversee all aspects of the Compliance Program. Additionally, the Chief Compliance Officer ensures that ATI develops and maintains an effective reporting system and oversees this reporting system operation. This Compliance Program vests in the Chief Compliance Officer complete authority to take all steps necessary to ensure that the reporting system operates in accordance with Compliance Program requirements. The Chief Compliance Officer ensures that the Compliance Hotline is operated in an effective manner. The Chief Compliance Officer is also responsible for coordinating training programs for ATI employees and establishing auditing and monitoring procedures. The Chief Compliance Officer and the Chief Executive Officer will direct all investigations and proceedings in a timely, but thorough fashion, and enlist the assistance of General Counsel and/or outside legal counsel, to the extent needed. The Chief Compliance Officer will promptly report all material information uncovered by the investigation to the Compliance Committee and to the Board of Directors.

ATI shall appoint a Compliance Committee comprised of at least three members, including the Compliance Officer. The Compliance Committee should represent various departments, including Operations. The Compliance Committee will annually review the Compliance Program Guide, Risk Assessment and Annual Compliance Report. The Chief Compliance Officer will be primarily responsible for establishing the Compliance Program. Committee members may change from year to year. At least annually, the Compliance Committee will review the operations of the Compliance Program to ensure the Compliance Program is appropriately funded, effective, and as needed, propose modifications to the Compliance Program. The Chief Executive Officer will have final authority over the entire Compliance Program, which includes the authority to approve any proposed modifications.

3. Conduct Background and Sanctions Checks

ATI Physical Therapy is committed to ensuring that we execute on our Mission to provide the highest quality of care in a friendly and encouraging environment. To that end, we are committed to recruiting, hiring and retaining diverse talent that supports our Mission and Values. ATI expects that employees will treat colleagues, guests and patients with respect and professionalism.

ATI has an employee background check policy, which contains procedures for conducting background checks and how the company handles the results of a background check. ATI will conduct pre-employment criminal background checks and investigations for state licensure including sanctions and/or exclusions from any federal healthcare program, for all employment applicants and independent contractors who are offered a position and who are:

- Licensed health care providers, or
- Whose employment or contractor duties involve information technology, finance, billing or claims processing, and transportation drivers.

ATI will not knowingly employ or contract with individuals or entities, when a background check or investigation demonstrates that the individual or entity has been convicted of any felony criminal offense or sanctioned and/or excluded from any federal healthcare program within the past five years (e.g., Medicare fraud, money laundering, mail fraud, Stark Law violation, anti-kickback statute violation). In addition, ATI will immediately suspend and/or terminate any current employee, or independent contractor, if ATI learns of any said conviction or sanction and/or exclusion.

ATI will ensure that every employee who requires a professional license or credential to perform services on behalf of ATI is appropriately licensed and/or credentialed, and that such licenses and/or credentialing are renewed in a timely manner and in accordance with the state of issuance requirements.

All ATI employees requiring a professional license or certification must notify the Chief Compliance Officer and the Department of Human Resources within three business days of receiving any adverse determination or change regarding licensure or certification. Such adverse changes include, but are not limited to sanction and/or inquiries from any local, state or federal licensing or credentialing agency, regardless of the reason of the complaint from parties including, but not limited to, patients, patient representatives or payors.

4. Prevention, Detection and Correction

An effective Compliance Program includes mechanisms to prevent, detect and correct instances of noncompliance or violations of company policy. ATI must appropriately detect unlawful or unethical conduct and behavior, correct the behavior and prevent further bad actions from occurring. Such prevention includes implementing an appropriate screening process of employees and vendors to ensure that ATI does not knowingly employ or contract with individuals who have otherwise been engaged in unlawful or unethical behavior involving federal health care programs. ATI has a process in place to respond to potential misconduct. As described above, employees have an obligation to report potential or suspected violations of the Company's compliance policies and procedures. ATI will promptly investigate any reasonable allegation of fraud, abuse or waste, violations of the Compliance Program or other applicable laws or regulations. In investigating any potential issues, members of the compliance department work in collaboration with the operational units.

5. Communication

Effective communication ensuring confidentiality and non-retaliation is essential in getting employees to actively participate in the Compliance Program. Providing accessible lines of communication throughout the organization fosters an open dialogue that serves to protect ATI as a brand and leader in the industry. There are a number of communication channels through which complaints, concerns or questions may be addressed. ATI has an anonymous hotline which can be used to report violations or suspected violations of ATI's policy, Compliance Program or healthcare fraud and abuse laws. Additionally, the company's compliance page is accessible to all employees via ATI's intranet site, and includes a number of compliance resources, including policies and procedures, as well as industry resources. Employees may also direct communication to the compliance email address, and a member of the Compliance Department will respond.

6. Training and Education

We recognize and understand that ongoing investment and commitment to effective training at all levels is essential to attain the desired standards of excellence in service and to adhere to our Compliance Program. ATI's "do the right thing" philosophy is instilled in every employee; the commitment to compliance and ethical behavior begins at new employee orientation. ATI will provide its employees with appropriate, accurate education on the rules and regulations that govern the business of healthcare. Employees must be aware of their personal role and responsibilities, and must be educated on company compliance policies to support and actively contribute to the overall success of the Compliance Program. ATI also provides annual role-based training to all employees on applicable regulations related to the provision of rehabilitation services including, but not limited to, fraud, waste and abuse, HIPAA and harassment. ATI will provide additional ad hoc education, including training related to documentation, billing, coding and relevant regulatory changes or modifications.

7. Monitoring, Auditing, Effectiveness

ATI has implemented a system of auditing and monitoring to measure the effectiveness of the overall Compliance Program, ensuring compliance with federal program rules, as well as identifying enterprise compliance risks. The annual compliance plan addresses internal audit, and where appropriate, external auditing to ensure that our patients, clients, investors and employees are committed to compliance.

8. Enforcement of Disciplinary Standards

Effectiveness of our Compliance Program depends on enforcement. ATI must enforce its policies and procedures, holding employees accountable to company standards and legal requirements. Appropriate disciplinary action will be incorporated to drive active employee engagement and support the compliance mission of Always Thinking with Integrity.

COMPANY POLICIES AND PROCEDURES

ATI has published an Employee Handbook that outlines company expectations, policies and procedures. This Program Guide and Compliance Code of Conduct is intended to supplement the existing Employee Handbook. It is important that each employee recognizes that ATI's policies and procedures and guidelines will protect individual employees, as well as the company, from committing intentional violations of the law. While the Code of Conduct and Compliance Program Guide are intended to serve as guidance, they cannot address every situation that an ATI employee or affiliate may encounter. Therefore, ATI expects its employees and affiliates to exercise personal integrity and good judgment in every instance, whether specifically addressed or not.

Regulatory Inquiries and Investigations

Government agencies, regulatory organizations and their authorized agents may, from time to time, conduct surveys or make inquiries that request information about ATI, its patients or others that generally would be considered confidential or proprietary. All regulatory inquiries concerning ATI should be handled by the Chief Compliance Officer and/or General Counsel. Reports or reasonable indication of fraud, abuse or waste, violations of the Compliance Program, or violations of applicable law or regulation will be promptly investigated. The Chief Compliance Officer, General Counsel or their designee shall be responsible for directing the internal investigation of the alleged situation or problem. In undertaking the investigations, the Chief Compliance Officer, General Counsel or their designee may utilize other ATI Holdings, LLC employees, outside counsel, outside accountants and auditors, or other consultants or experts for assistance or advice.

Regulatory inquiries may be received by mail, email, telephone or by personal visit. In the case of a personal visit, demand may be made for the immediate production or inspection of documents. ATI employees receiving such inquiries should refer such matters immediately to the Chief Compliance Officer.

"I am not bound to win, but I am bound to be true. I am not bound to succeed, but I am bound to live up to what light I have."

– Abraham Lincoln

ATI INTERNAL RESPONSIBILITIES

Confidentiality/Non-Disclosure

ATI's policy states that all employees and agents must protect ATI Physical Therapy's confidential information and avoid disclosure of confidential information. ATI's legal counsel should be involved in all decisions related to the disclosures of confidential information, even if such disclosures are required by law or other legal proceedings.

Confidential information refers to information that is not in the public domain and that might affect our business dealings or competitive position in the marketplace. Intellectual property, includes our in-house developed information technology systems, business strategies, pricing models and financial information, information about current or planned service lines, for example. Such confidential information is a valuable asset and should only be used for purposes of completing your specific job-related functions.

Conflicts of Interest

ATI expects officers, stockholders, employees, vendors, and volunteers to avoid any activities that may involve a conflict of interest. A conflict of interest exists when a person's private interest interferes, or even appears to interfere, in any way with the business interests of ATI. Employees should avoid conflicts, as well as the appearance of conflicts, between their private interests and the business interests of ATI.

A conflict of interest may occur if outside activities or personal interests influence, or appear to influence, the ability of a person to make objective decisions in the course of their job responsibilities. Any questions about whether an outside activity might be, or appear to be, a conflict of interest should be directed to the Chief Compliance Officer or the General Counsel.

Business Information

ATI is committed to the integrity and accuracy of documents and records. ATI will maintain accurate books and records in support of all claims filed for reimbursement from any federal, state or private healthcare program. ATI's employees and contractors are prohibited from making false statements in any ATI book or record, including but not limited to, all business records, patient medical records and medical billing records, or on any ATI document prepared for or filed with any government or private entity or person. ATI employees may not tamper with, remove or destroy records or documents, except in accordance with ATI record retention and destruction policies or as directed by the General Counsel or their designee.

Accurate Books and Recordkeeping

ATI will maintain accurate books and records in support of all claims filed for reimbursement from any federal, state or private healthcare program. ATI's employees and contractors are prohibited from making false statements in any ATI book or record, including but not limited to, all business records, patient medical records and medical billing records, or on any ATI document prepared for or filed with any government or private entity or person.

Record Retention

ATI shall retain all recorded information, regardless of medium, that is generated and/or received in connection with ATI transactions and legal obligations, for the applicable required retention period(s) as set forth under federal and state law, or for a period of seven years, whichever is longer.

ATI records will be destroyed after all applicable retention periods have expired. Records shall be kept in their original form or in an acceptable alternative form for storage. All records shall be maintained in a usable condition and in an appropriate environment to secure the integrity of the information. Confidentiality of all records pertaining to patient care or billing will be maintained in accordance with applicable federal and state laws and regulations including, but not limited to requirements under HIPAA. Questions regarding record retention should directed to the General Counsel.

Employment and Medical Records

ATI values and respects the employment relationship and confidentiality of employment-related matters. As such, only individual employees who require access to employee records as part of their direct job responsibilities will be given access to such records. Employees seeking medical services from ATI will be afforded the same level of privacy and security as all other patients with respect to their medical records. Medical records are kept separate from employee personnel records and will not be released without a written authorization from the employee, or as required by law.

Auditing and Monitoring

ATI recognizes the need for ongoing internal auditing and monitoring to ensure a successful business and Compliance Program. As such, ongoing internal compliance auditing and monitoring is performed through the coordination of activities administered by operations management and leadership under the direction of the Chief Compliance Officer. Areas of concern or vulnerability are addressed, when applicable, by way of a corrective action plan with appropriate follow-up.

ATI has established a compliance calendar on an annual basis that includes monitoring activities, as well as informal and formal routine audit activities.

ATI also recognizes the need for ongoing external auditing and monitoring to ensure patients, clients, investors and employees that our commitment to compliance is supported objectively. Compliance monitoring and auditing will be conducted externally through payor audits, external accreditation agency review, if applicable, and through independent third-party examination of annual financial reports and compliance activity.

Billing, Coding and Documentation

ATI is committed to fair and accurate billing in accordance with all applicable federal and state laws and regulations, payor rules and procedures, and ATI policies and procedures. We understand that all claims for services submitted to any private insurance program or payor, Medicare, Medicaid, or other federally funded healthcare programs, have to be accurate and correctly identify and document the services ordered and performed. ATI will bill only for services actually provided and documented in the patient's medical records. ATI clinical staff will ensure that all billing to payors and patients accurately represents the services provided in a truthful manner, and that the clinical documentation adequately supports the billing of the services as required by the payor contract.

ATI will not engage in and/or permit known up-coding or unbundling of services rendered and/or other improper billing practices intended to increase reimbursement. ATI will not compensate employees in any way to improperly up-code claims.

ATI will require payment of insurance co-payments and deductibles and will only waive required fees following a determination of patient financial need in accordance with ATI's applicable policies and procedures, and after reasonable collection efforts have failed. ATI will use systematic methods for analyzing the payments received and will reconcile any overpayments in a timely manner after discovery, review and confirmation that overpayment should not be applied to any outstanding accounts receivable owed to ATI. ATI will assign diagnostic, procedural and other billing codes that accurately reflect the services that were provided. ATI will periodically review coding practices and policies, including software edits, to facilitate compliance with all applicable federal, state and private payor healthcare program requirements, and will investigate inaccurate billings and payments to determine whether changes to current protocol or other remedial steps are necessary.

Periodic Testing of Claims System

ATI will periodically audit its manual and automated billing systems to ensure proper operation of all steps required to generate claims for healthcare services. Comprehensive audits should be conducted no less than annually to ensure timely detection and corrective action of system failures or errors. If a billing systems audit reveals system failures or errors, the department manager responsible for the audit should immediately consult with the Chief Compliance Officer to determine whether the failure necessitates corrective action.

Sales and Marketing Practices

ATI is committed to honesty and integrity in all aspects of its business, including its sales and marketing practices. ATI will ensure that all advertising and marketing materials accurately and truthfully represent our service offerings and adhere to all applicable rules and regulations. Any promotional, marketing or advertising materials, or digital media provided to or focused toward ATI referral sources, patients or members of the community, must be coordinated with or developed by the Marketing Department prior to any distribution. Prior to distribution or use of any promotional, marketing or advertising materials, or digital media coordinated with or developed by the Marketing Department, materials must be reviewed and approved by the head of Marketing, or a designee, and the Chief Compliance Officer or a designee.

Public Statements and News Releases

It is important that ATI Physical Therapy and/or its affiliates provide the public with consistent and accurate information regarding our service offerings and operations. Employees may not make public statements regarding matters about the organization unless they have been designated as a company-authorized spokesperson by the Marketing Department. If the media contacts you regarding an ATI Physical Therapy or affiliated matter, please refer them to the Director of Corporate Communications in the Marketing Department at 630-296-2223 Ext. 7993.

The Marketing Department is solely responsible for issuing all press releases on behalf of ATI. Under no circumstances may a press release be issued by any other entity, subsidiary, or department of ATI. To facilitate press release requests, please contact the Director of Corporate Communications at 630-296-2223 Ext. 7993. The Marketing Department will review each proposed press release according to company guidelines. The Marketing Department will submit all press releases to the Chief Compliance Officer, or a designee, for review and approval. Sponsors of a press release should plan for a minimum of five business days for review and issuance of all press releases.

Speeches and Conferences

Many employees are actively engaged in industry and professional associations and events, and ATI encourages such participation. However, before an employee accepts a speaking invitation as an ATI representative at a public event, participation must be approved by both the employee's direct manager and the Director of Corporate Communications in the Marketing Department. The Marketing Department will submit all presentation materials and other speech content to the Chief Compliance Officer, or a designee, for review and approval prior to delivery; provided, however, that the Chief Compliance Officer may delegate to Corporate Communications/Marketing Department the sole approval authority for certain routine or regularly recurring types of presentations or speech content.

Website Content

Marketing is responsible for all public facing website content. All marketing collateral must be pre-approved by the Chief Compliance Officer or their designee prior to circulation.

Political Activities

ATI supports appropriate efforts to influence legislation and public policy in effecting the communities that we serve. ATI does not support attempts to influence legislation or policy that pertains to personal agenda. ATI employees are free to participate in the political campaigns outside of normal business hours.

Solicitation

Solicitation of staff, therapists and patients on ATI Physical Therapy property is prohibited. Any notice or other solicitation materials to be posted on or in ATI Physical Therapy clinics or premises must have prior approval of the supervisor ultimately responsible for that area.

"If you don't stand for something you will fall for anything."

– Gordon A. Eadie

ACCOUNTABILITIES WITH COMPETITOR

Anti-trust

ATI is committed to complying with all applicable federal and state anti-trust laws. Employees and agents of ATI are prohibited from engaging in conduct that violates the federal or state anti-trust law laws, including sharing sensitive information with competitors with the intent of engaging in price fixing.

VENDOR/SUPPLIER DEALINGS

Anti-Kickback Statute

No employee of ATI or any other person acting on behalf of ATI may solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. In an effort to comply with this policy, any financial or business arrangement with ATI or an affiliate must be in writing and approved by the Legal and Compliance Departments. ATI will review all contracts and business arrangements with vendors and suppliers for compliance with anti-kickback law.

Business Courtesies

ATI will not engage in any form of commercial bribery, including the offer or acceptance of any improper payment, gratuity or gift to obtain business or influence business decisions. Employees who are uncertain about proper gifting practices should consult with their supervisor, review ATI's policy on gifts, or contact the Chief Compliance Officer.

Business Courtesy with Government Employees

Federal and state governments have strict regulations regarding business courtesies for their employees. ATI will not knowingly provide any gifts, entertainment or anything of value to any employee of the federal or state government. To the extent where permitted, modest meals or refreshments connected with business or educational sessions may be provided.

Business Development

An ATI employee may extend business courtesies to a potential referral source. The total value of such business courtesies per calendar year generally shall not exceed the annual published non-monetary compensation limit on the physician self-referral at 42 CFR §411.357(k). Nothing in this statement permits any business courtesy or other benefit that is understood by either party to be offered or provided as an inducement to refer patients or business or as a reward for such referrals, nor may a business courtesy be extended to a potential referral source who solicits it. Potential referral source include, but are not limited to: a doctor of medicine or osteopathy, a doctor of podiatric medicine, physician assistant, nurse practitioner or a chiropractor.

INFORMATION TECHNOLOGY AND SOCIAL MEDIA

ATI employees should be familiar with policies regarding the use of email, the Internet, company-owned electronic devices and personal electronic devices, and any other form of technology used for communication. Employees must use these technologies properly and in accordance with ATI guidance, policies and procedures, and should consult with their supervisor regarding questions or concerns. ATI requires employees to use passwords, encryption and other security measures to protect company computers, mobile devices and other equipment. Employees should use all reasonable means to prevent unauthorized access to ATI information.

All email, voice mail and personal files stored or maintained on ATI equipment are company property. Employees should have no expectation of personal privacy in connection with information stored on ATI computers or servers.

No ATI sponsored social media site may be established without the approval of ATI's Marketing Department. Only those employees officially designated by Corporate Communications/ Marketing Department have the authorization to "speak" through any social media site, sponsored or otherwise, on behalf of the company. Inappropriate online communications can lead to misinformation about the company, a clinic, patient or employee, possibly damaging the brand and initiating legal or regulatory action. Employees authorized to "speak" through social media are responsible for ensuring that they are well informed about the application of this policy and with the information about ATI that is publicly available, and go through the appropriate approval channels in Marketing.

GOVERNMENT DEALINGS

Government Reimbursement

ATI Physical Therapy is an enrolled supplier with the Centers for Medicare & Medicaid Services, and as such, is committed to adhering to and complying with all applicable rules, regulations and laws. Failure to comply with all applicable rules may subject ATI to severe financial penalties and fines, possible exclusion from participation in federal healthcare programs, or even criminal prosecution of individual employees of ATI. Equally important is the impact on our national brand and reputation that any such violation could cause.

Government Inquiries and Investigations

ATI intends to cooperate with any lawful inspection, audit, inquiry or investigation, including warrants and subpoenas, while protecting the legal interests of ATI and its personnel. Employees, agents, volunteers, contractors and sub-contractors are expected to fully cooperate and not interfere with an investigation. All employees, agents, volunteers, contractors and sub-contractors should notify their immediate supervisor, the Chief Compliance Officer and the General Counsel should they receive any government inquiry, including search warrants, subpoena or other legal documents naming ATI Physical Therapy. Any employee who knows of an impending visit by a government investigator shall immediately report this information to the Chief Compliance Officer.

If You Are Contacted by a Government Agent

1. The investigator has the right to contact you and request to speak with you.
2. You have the right to choose whether or not to speak with any investigator. In all situations you have the right to consult with an attorney before you decide whether or not you will speak to the investigator.
3. The government agent DOES NOT have the right to insist on interviewing you.
4. If you decide to refuse to speak with the investigator, be firm but professional.
5. If you decide that you are willing to be interviewed, you can insist that the interview be in the presence of an attorney. ATI may provide counsel to represent you.
6. If you decide to speak with a government agent, it is very helpful if you notify the Chief Compliance Officer or the General Counsel. You have every right to tell ATI about the government contact. The government agent may request or suggest that you keep the contact confidential, but there is NO law that prevents you from disclosing any details of your discussion with the government agent.
7. If you decide to interview with the government agent, ATI recommends that you have legal counsel present.
8. Under all circumstances, you must tell the truth to government agents. Failure to do so may, in and of itself, be a violation of the law.
9. Do not destroy any documents or attempt to hide evidence.

DEALINGS WITH PATIENTS

Quality of Care

ATI seeks to provide the highest quality of care by ensuring that all clinical staff is educated and qualified to render the services. Only qualified personnel with the appropriate license or certification will be permitted to evaluate a patient and establish an appropriate treatment plan. Care will be provided under a supervised licensed provider and in accordance with state practice act and payor contract requirements which may vary from state to state and from payor to payor.

Patient Information

Personal, identifiable, patient information including medical and billing records must be kept confidential and only used and/or disclosed to accomplish the business task at hand in accordance with the minimum necessary requirements under HIPAA. ATI is committed to protecting patient health information and adhering to all applicable privacy and security rules including but not limited to HIPAA.

"The important thing isn't what other people think you are; it's who you are."

– Shannon L. Alder

Patient Bill of Rights

ATI strives to ensure that each patient is provided the highest quality care and in accordance with high professional standards that are continually maintained and reviewed. We understand that patients have entrusted their care to us and we treat all patients with dignity, respect, and only provide appropriate services as needed. By requiring informed consent for treatment, we assure that each patient and/or his/her representative is involved in all aspects of a treatment plan. Patients and their representatives are afforded consideration of their privacy concerning their own medical care program. Case discussion, consultation, examination and treatment are considered confidential and should be conducted discreetly. The patient has the right to full information in layman's terms concerning diagnosis, treatment and prognosis, including information about alternative treatments and possible complications. We will endeavor to involve patients in their treatment program by incorporating their feeling, interests, attitudes and goals in the treatment planning and implementation process. A patient has the right to therapy and related services without discrimination based upon race, color, religion, sex, sexual preference or national origin.

Offering Patient Inducements/Waiver of Copay

Federal law prohibits ATI from offering anything of value to a Medicare or Medicaid patient or family member of the patient to induce the patient to select ATI for medical services. In an effort to comply with this law, ATI will not offer any prohibited benefits to patients or their family members to induce patients to utilize ATI or affiliated facilities. Questions regarding whether an item or service is an appropriate patient benefit should be directed to the Compliance Department. ATI will not routinely waive patient financial responsibilities in the form of copays or coinsurance.

Patient Gifts and Courtesy

ATI has adopted the interpretation by the Office of Inspector General that inexpensive gifts (other than case or cash equivalents) or services does not violate the federal statute. For enforcement purposes, inexpensive gifts or services are those that have a retail value of no more than $10 individually, and no more than $50 in the aggregate annually per patient. ATI employees are not generally permitted to accept tips, money or individual gifts from patients or family members. Questions regarding patient gifts and courtesy should be directed to the Compliance Department.

Credit Balances

ATI and its affiliated entities are committed to keeping accurate patient accounting, including tracking, reporting, and refunding overpayments when applicable and has appointed a designated person(s) to ensure that the credit balance process is maintained in accordance with federal law and payor requirements.

"Integrity is telling myself the truth. And honesty is telling the truth to other people."

– Spencer Johnson

ATI PHYSICAL THERAPY

ALWAYS THINK INTEGRITY

ALWAYS THINK INTEGRITY

Integrity in the work place is imperative for a healthy, ethical working environment. It does not matter what your rank or position is, living with workplace integrity will make a difference to your long-term professional development and to our company culture. Workplace integrity starts with honesty, decency and trustworthiness. Following through with your word and being impeccable and honorable with your actions creates respect and professionalism.

So What Is Integrity?

A person demonstrating the value of integrity is someone who:

- Is honest.
- Stands up for what he/she believes in.
- Knows thyself.
- Is steadfast.
- Is willing to make tough – even unpopular – decisions.
- Is courageous in conflict.
- Does what he/she says one will do.
- Considers what's best for the group rather than what's best for oneself.
- Is someone you can count on.
- Is someone who keeps one's promises.
- Is someone you can really trust to do the right thing.
- Walks one's talk.

Questions or Concerns

The ATI Compliance Program requires your active participation. Employees and contracted staff are expected to raise concerns about compliance and ethical issues and are empowered to report any conduct believed to be in violation of any law, this Compliance Program Guide or any company policy.

ATI Management will maintain an open-door policy to encourage employees to bring forward questions or concerns. Direct communication may be directed as follows:

Mail:
Chief Compliance Officer
ATI Physical Therapy
790 Remington Blvd.
Bolingbrook, IL 60440

Email:
Compliance@atipt.com

If you prefer, you can submit your complaint **anonymously** to the ATI Compliance Hotline; the ATI Compliance Hotline will contain no information that could trace the complaint to you. This lack of contact information, however, may prevent ATI's comprehensive review of the complaint. So, we encourage you to provide contact information for possible follow-up.

Phone:
ATI Compliance Hotline: 800-428-1678

"Nothing is at last sacred but the integrity of your own mind."

– Ralph Waldo Emerson, Self-Reliance

ATI: Recognized as a Leader

Named "Best Physical Therapy Practice" in the nation by ADVANCE Magazine for performing exceptionally strong in all areas of assessment including patient care and growth, employee training and retention, professional service delivery, community presence, state-of-the-art facilities and company expansion. Awarded URAC Core Accreditation, recognizing ATI's commitment to quality healthcare.

OUR MISSION

At ATI Physical Therapy, we are driven by our mission:

To exceed customer expectations by providing the highest quality of care in a friendly and encouraging environment. To achieve our mission, we look for phenomenal individuals who are bright, creative, dedicated and energetic.

ATI PHYSICAL THERAPY | ALWAYS THINK INTEGRITY

Corporate Office
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