Dear Colleagues,

As a leading national provider of senior healthcare services, Consulate Health Care continues to strive for operational excellence by providing our residents and their families with the highest quality care and service. As Ambassadors of Care, we are committed to exemplifying our mission statement, “Providing Service with Our Hearts and Hands”, in the work that we do every day. Our success in achieving our mission requires that we embrace our Core Values of Compassion, Honesty, Respect, Integrity and Passion and incorporate them into our daily routine.

Embracing our mission comes with great responsibility. As a good corporate steward, we must conduct ourselves with honesty and integrity in our business practices. As a health care provider, entrusted with caring for our residents and patients, we must have compassion for those we serve. As a responsible employer, we must create an environment whereby employees respect one another and everyone they come in contact with. And, because our mission is caring for people, our employees must be passionate about what they do.

Consulate takes great care to assure that all billings to government, third-party payors and patients are accurate and conform to all material federal and state laws and regulations. We prohibit any employee or agent of Consulate from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious or fraudulent.

Consulate’s Code of Ethics is our company’s written commitment to promoting ethical behavior and the highest quality care for our residents and patients. It sets forth the standards for ethical, legal, and professional conduct that is expected of all employees, enabling us to perform our responsibilities with the utmost integrity. While a written set of ethical standards cannot provide for every situation that you may face, it does provide you with an ethical foundation to use to make decisions, as well as resources to assist in addressing any issues or concerns you may encounter. If you have any questions about this Code or your responsibilities as a Consulate Health Care employee, or you wish to report behavior that you believe violates this Code, please contact the Corporate Compliance Department. You can also anonymously report your concern by calling the Corporate Compliance Hotline at 877-582-6336. You will never face retaliation for making a good faith report of your concern.

Our continued success depends on our adherence to our Core Values, our commitment to ethical and responsible behavior, and to our compliance with the laws and regulations that govern our industry.

Sincerely,

Chris Bryson
Chief Executive Officer
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The Code of Ethics, the “Code,” is our company’s written commitment to promoting ethical behavior and the highest quality care for our residents and patients. The Code highlights our standards for ethical, legal, and professional conduct, as well as describes how you may voice your concerns about any legal or ethical issues that you may encounter so they may be resolved in an appropriate manner.

The Code is the foundation of the compliance program and it applies to all employees of the company. The ethical behavior outlined in the Code applies not only to your time at work, but may also apply to your behavior outside the workplace if it reflects on the company.

The Code is not an employment contract, nor is it intended to give any rights to any employee related to continued employment.

If you have any questions about this Code or the company’s compliance efforts, please speak with a member of the company’s compliance team.
The mission of the organization is “Providing Service with our Hearts and Hands.”

The Core Values were implemented to create and foster an environment conducive to the overall comfort of those entrusted to our care.

**CORE VALUES**

**COMPASSION**

a deep awareness of the suffering of another and the desire to alleviate it.

**HONESTY**

the quality of being fair and truthful.

**RESPECT**

a high regard and esteem for others.

**INTEGRITY**

doing my job to the best of my ability even when no one is looking.

**PASSION**

a strong enthusiasm for and devotion to our mission of “Providing Service with Our Hearts and Hands”.
The company compliance program is a comprehensive program designed to promote a culture of ethical behavior, both individual and corporate, and adherence to the many laws and regulations that apply to our industry. In addition, the compliance program is designed to detect and prevent fraud, waste, and abuse, as well as to prevent the violation of laws, regulations and company policies and procedures.

The Code of Ethics is only one part of the overall compliance program. In addition to the Code, our company has established a corporate mission statement and core values, employee training programs, policies and procedures, and business systems, as well as a compliance committee to assist in upholding the program. The program is administered by the Corporate Compliance Officer.

The following elements form the core of our compliance program:

- Written policies, procedures, and standards of conduct
- Oversight of compliance efforts and a designated compliance officer
- Effective training for employees
- Procedures to ensure unethical persons are not employed
- Consistent disciplinary enforcement
- Internal monitoring and auditing
- Multiple options regarding reporting compliance concerns
- Prompt response to compliance concerns and appropriate corrective action

Our success as a health care provider depends on each and every employee – your work ethic, your personal integrity, and your professional obligation to provide excellent care to our residents and patients. You are responsible for supporting the compliance program, reporting potential legal or ethical issues, and acting with integrity in all that you do.

The Code is your guide to appropriate and expected work place behavior. The Code is not meant to cover every conceivable situation you may encounter or every law or regulation that applies to your work environment. It is meant to provide guidance and to assist you in making ethical decisions and using good judgment in your professional obligations.
In many instances, company policies and procedures will provide detailed guidance on how to handle specific situations. For those situations where a policy is not immediately apparent or there is not a written policy that applies, please contact the Compliance Department or Legal Department to ensure that any decisions or actions reflect our company’s commitment to ethical behavior. The code describes the company’s values and ethics, as well as elements of the company’s compliance program. It supplements your Employee Guidebook and the specific policies and procedures that apply to your job.

Upon hire and every year of employment, each employee is required to read the Code of Ethics, accept responsibility for following the Code, and sign and return the Commitment to Compliance Certification that accompanies the handbook. The signed Commitment to Compliance Certification will become a part of your permanent employee record with the company.

**Shared Responsibility**

We are in the business of caring for others. As healthcare professionals, whether providing direct care or supporting those that do, it is vital that each employee follows the standards set forth in this Code. We must demonstrate ethical behavior in our relationships with:

- Our patients, residents and their family members
- Our coworkers
- State and federal regulators and surveyors
- Vendors and suppliers
- Physicians and other health care professionals
- All business associates that the company depends on to assist in providing care.
If we compromise our ethics, we potentially compromise patient care. As a health care provider, we operate under very strict regulations and governmental oversight. We must be vigilant in stopping any form of fraud or abuse. Even innocent mistakes can have significant consequences that could result in penalties to the company and/or individual employees. Those penalties could be financial and in specific cases the penalties can be criminal.

You are required to undergo compliance training on the Code of Ethics and the company’s compliance program as a condition of employment. The principles discussed in the Code of Ethics are mandatory standards; you must follow the Code to remain employed. Violations of the Code of Ethics or company policies and procedures are grounds for disciplinary action, up to and including termination.

Personal Responsibility

In addition to our shared responsibility to follow the guidelines in the Code of Ethics, each of us is responsible for assisting in the enforcement of the Code. You have a duty to report any issues or problems you observe.

If you know or suspect a situation to be unethical, illegal, or unprofessional, or you have a concern relating to abuse and neglect, ethics, or a financial issue, you have an obligation to report that suspicion or concern. If you know of a violation and do not report it, you could face disciplinary action for not reporting; in some cases, a failure to report could also cause you to face legal action.

As mandated by various state or federal requirements, unethical, illegal, or unprofessional behavior may need to be reported to the designated state or federal agency. In certain circumstances, as a health care worker, you are considered a “mandatory reporter.” This designation requires you to report any incident that you have knowledge of or have observed that you suspect may be abuse to your supervisor so that the appropriate state or federal agency can be notified.
CODE OF ETHICS
COMPLIANCE PROGRAM

Your reporting obligation also applies to yourself. You have a duty to report in writing the loss or suspension of a clinical or professional license – an example would be your nursing license or nursing assistant certificate, or an arrest or conviction for the violation of any law (other than minor traffic violations). You are also required to report any notification received from the Office of Inspector General that you have been added to the list of excluded individuals and entities (LEIE). You are not permitted to work a scheduled shift if your professional license or certificate, necessary to work in your position, has been suspended or revoked. You must report these events to your immediate supervisor prior to the start of any shift or within three (3) days of the loss or suspension, or arrest or conviction, whichever occurs first.

No Retaliation

Employees who in good faith report a suspected or actual violation will not be subject to discipline or retaliation. The company will not tolerate any form of retribution, retaliation, or harassment by fellow employees or supervisors for good faith reporting. Any employee who violates this prohibition on retaliation will be subject to discipline, up to and including termination. However, an employee who is involved in wrongdoing and reports it, while considered a positive action, will still be subject to discipline for their actions. Similarly, an employee who makes a report that purposely contains false or misleading information will also face disciplinary action.

Corporate Compliance Hotline and Compliance Reporting

Reporting suspected issues and concerns is an obligation that the company and its founders firmly believe in. You have a personal responsibility to report any concerns you may have regarding potential or actual illegal, unethical, or unprofessional acts or behavior. Without acknowledging and addressing our own shortcomings, we cannot continue to improve our quality of care for our patients.
To report a concern:

• You may speak with your supervisor. Your supervisor is the best resource to address your concerns and is most familiar with the laws and company policies that relate to your work.

• If you are not comfortable going to your supervisor or are unsatisfied with the response, you may speak to another member of company management, such as the Executive Director or the Director of Clinical Services.

• You may call the Corporate Compliance Hotline: 1-877-582-6336 at any time, whether or not you have spoken to a supervisor. All calls are confidential and you may remain anonymous if you choose.

The Corporate Compliance Hotline is available twenty-four hours a day, seven days a week, to report any good faith concern about legal, ethical, or quality issues. The Corporate Compliance Hotline is administered by a separate, unaffiliated company. The calls are received by their operators and a report is passed along directly to the Corporate Compliance Department. Every call is reviewed by the Corporate Compliance Department and investigated by an assigned professional with experience with the reported issue.

While the ability to report an issue anonymously is available, be aware that remaining anonymous may limit the company’s ability to investigate your concerns. If you do provide your name, the Corporate Compliance Officer and the company will protect a reporting person’s confidentiality to the fullest extent possible consistent with the law and the company’s need to investigate the issue. You are required to provide enough information to initiate an investigation, such as the circumstances giving rise to your concern and the location/center where the issue occurred.

Each caller is provided a PIN number that will allow you to call the Corporate Compliance Hotline to hear if the situation or issue has been resolved. In order to maintain confidentiality, you will not be told if your concerns were substantiated, the result of any investigation, or what actions may have been taken. However, if changes are appropriate, you may see changes or corrections put in place as the company addresses your concerns.
If you have questions regarding what qualifies as a corporate compliance issue or anything you may perceive as a compliance concern, you are encouraged to call the Corporate Compliance Hotline. If you have questions about company compliance policies, compliance materials (including this Code), or your compliance responsibilities, in addition to calling the Corporate Compliance Hotline, you are encouraged to speak with the Corporate Compliance Officer. The Corporate Compliance Officer can be reached by calling the main officer number: **407-571-1550**. If you have a non-compliance concern that falls outside the reporting methods referenced above, you may report these concerns to your supervisor, Executive Director, human resources or the appropriate agency.

In addition, all states have specific laws designed to protect older adults from the risk of abuse, neglect, exploitation, and abandonment. These laws require the mandatory reporting of suspected elder abuse situations whenever there is reasonable cause to suspect a resident of a long-term care center is the victim of abuse or physical injury.

**When should I call the Corporate Compliance Hotline?**

You should call the Corporate Compliance Hotline any time you observe or suspect illegal, unethical, or unprofessional conduct or have a concern about abuse or neglect. It is part of your professional obligation as a company employee to report suspected issues and concerns.
Patient and Resident Care

Patient care is the first priority of the company and should be the first priority of each and every employee. Our residents and patients put their trust and faith in us, individually as caregivers, and collectively as a company. It is your responsibility to ensure that each patient and resident receives the best possible care. If you feel that any of our patients are not receiving the attention and the level of care we are pledged to provide, please raise that concern and continue to do so until you feel satisfied.

Abuse and Neglect

Each of our patients and residents are entitled to dignity and respect. Under no circumstances will any form of neglect or abuse toward any patient or resident be tolerated. This is a company standard that must not be violated.

Abuse can come in many forms: physical, emotional, verbal, and sexual. You have an individual duty to ensure that our patients are protected from such forms of abuse from any individual, including fellow employees, other residents, family members, and other visitors.

• **Physical abuse** – any form of physical contact that is harmful to a patient. It need not result in actual pain or injury. The improper or unauthorized use of restraints is also considered abuse.

• **Emotional or verbal abuse** – using words to inflict harm on a patient, whether those words come from an employee, visitor or another patient. The harm may be emotional pain, mental anguish, or fear; such abuse can be as simple as name calling, yelling, or threatening or demeaning a patient or resident.

• **Sexual abuse** – can be a type of physical abuse in the form of inappropriate contact that may include harassment or assault, or it can be emotional abuse in the form of coercion.
• **Neglect** – is the intentional or unintentional disregard of a patient or his or her needs. It can be leaving a patient in the hallway alone for an extended period of time, ignoring a call light, refusing to provide sufficient food or drink, or even isolating a patient from others. Any form of neglect is unacceptable. It is illegal and an individual responsible could face legal or criminal charges.

**Relationships Between Staff and Residents**

The trust and confidence of our residents and patients is earned through the efficient and competent provision of services. You should always display a polite and professional attitude. The company expects each staff member will maintain a professional relationship with their patients.

Business transactions or the borrowing or lending of money between employees and residents is unprofessional and is strictly prohibited. Employees are also prohibited from dating residents or engaging in any romantic or consensual sexual activity with a resident.

Due to your dedicated efforts on behalf of our patients, grateful patients or family members may offer you gifts or gratuities (tips). Residents may even try to give away precious possessions without understanding what they are doing. Accepting any gift or gratuity from a patient or family member is strictly prohibited. Accepting gifts or gratuities can give the impression that we are favoring one resident or giving a specific resident extra attention or special care – to the detriment of other patients. At the discretion of the center’s Executive Director, nominal gifts that may be shared by all employees may be accepted.

Employees are also expected to respect our patients’ and residents’ personal property. You must protect these items from loss, damage, and theft; this includes patient trust accounts. Patient trust accounts are for the exclusive use of the patient and funds are only used upon the specific approval of the patient or their legally responsible party.

Any violation of the above expectations is grounds for disciplinary action. If you suspect any of the above violations, you have an obligation to report it immediately.
Patient Rights and Freedom of Choice

We respect the right of each patient and resident to participate in health care decisions. We are obligated by law to inform our patients of this right. A patient’s right to participate includes the right to determine what care to accept or to refuse. These decisions may even conflict with company policies.

In addition to the right to determine health care choices, according to Medicare, any individual entitled to benefits may obtain health services from any institution qualified to participate in the Medicare program that provides services.

Patient and Resident Confidentiality

A patient’s medical, financial, and personal information is protected by federal law. Only authorized individuals are permitted to access patient records. In general, a patient’s confidential or privileged information cannot be divulged to anyone except when necessary to provide health care services to the patient or resident, to perform your duties, or with the express permission of the patient or resident.

A resident’s information may be transmitted in many forms: verbal, written, and electronic formats. HIPAA requires us to ensure that protected health care information about a patient or resident is not seen, heard, read, or shared with anyone who is not authorized to receive that information.
False Claims

The health care industry is heavily regulated, with many very specific requirements that are necessary for billing the federal and various state governments. The company is committed to honest billing practices and adhering to all applicable laws and regulations, including the False Claims Act.

A false claim is knowingly or willingly making a false statement in any application for a benefit or service in conjunction with a federal health care program.

The company will not tolerate any employee who willingly or knowingly falsifies a claim or submits false information that leads to the submission of a false claim. The legal penalties for false claims to the government are very high, including the potential for individual criminal penalties for such conduct. Specifically, a violator is liable to the federal government for a civil penalty of not less than $5,500 and not more than $11,000, plus 3 times the amount of damages that the government sustains because of these acts. There may be additional and separate state penalties for false claims.

Examples of a false claim:

- Providing a service to a patient that is not medically necessary or reasonable
- Billing for a service when there is not correct or sufficient documentation to support the claim (either clinical or therapy documentation)
- Billing for services that were not provided
- Providing false information about a patient's eligibility or medical condition
- Documenting an incorrect code for services to obtain a higher reimbursement
- Claiming a licensed professional provided services when the person providing services was not properly licensed
- Falsifying the time you worked that inaccurately states the costs for providing services
- Failing to promptly refund credit balances back to the proper state or federal agency
Suspected false claim violations must be reported to the Corporate Compliance Hotline if you wish to remain anonymous or to the Corporate Compliance Department directly. In addition, company policy prohibits retaliation against an employee or harassment of an employee because of his or her participation in a false claim investigation or report. Federal law and some state law also provides for private citizens to file a lawsuit on behalf of the government and to share in a percentage of any monetary recovery or settlement based on false claims. If you have questions as to what your specific state laws are, please contact the Corporate Compliance Hotline.

Billing practices are very important. If you are involved in patient billing, you are asked to be extra cautious when preparing the documentation or billing information. Follow all company policies and procedures, as well as any insurance carrier, regulatory agency, and fiscal intermediary requirements. Even employees who are not directly involved in patient billing must comply with these requirements. Accurate documentation of a patient’s admission information and condition, as well as what services are provided, is the cornerstone of health care billing. If you are involved in documentation in any form (admissions, MDS evaluation, nursing, therapy, etc.), you must always provide accurate information, and ensure that you follow proper policies and procedures.

Referrals and Kickbacks

The Anti-Kickback law makes it a crime to knowingly offer or receive payment or solicit anything of value to obtain or reward a referral of business under federal health care programs.

In order to follow both the letter and spirit of the Anti-Kickback law, and to avoid even the appearance of a violation, both the company and all employees will not accept or offer to provide any item of value in exchange for the referral of a patient, or a resident, or a business opportunity; nor will the company or any employee accept any item of value in return for buying services or supplies. The prohibition on offering or accepting items of value extends to anything that may influence or even appear to influence a decision regarding a health care service.
A “kickback” or item of value can include cash, as well as goods, services or gifts of more than nominal value. Accepting a kickback is not only contrary to corporate policy, it is also against the law.

**Business Relationships and Gifts**

Employees are prohibited from accepting any gift or business courtesy from an existing vendor or contractor, or from potential vendors or contractors, if the value is more than a nominal amount or it is intended or may be perceived as intended to influence a decision regarding the business relationship with such vendor or contractor.

Any gift of more than nominal value must be reported to either your direct supervisor or the Corporate Compliance Officer. Your center director or a senior supervisor may permit the acceptance of, may require the return of, or may require the donation to a charity of such gifts. Some gifts may be perishable and/or impractical to return. If the gift is accepted, it should be shared by all the employees of the department or center.

Employees are allowed to accept meals or similar business courtesy or entertainment so long as it is of reasonable value, occurs infrequently, and is for the purpose of discussing business matters and not for the purpose of influencing a decision regarding a business relationship matter. The company makes no attempt to define nominal or reasonable as a specific dollar amount; rather, the company expects employees to use good ethical business judgment in accepting such entertainment or courtesy.

If you have any questions about the ethics involved with accepting a gift – either on behalf of yourself, your fellow employees, or your center – please contact the Corporate Compliance Officer.
Antitrust Laws

The company expects to compete vigorously, but fairly, within the industry and expects to comply with all applicable antitrust laws and regulations. In general, these laws prohibit competitors from entering into any agreement or understanding that limits competition in any way. Therefore, employees must never have discussions with competitors that may be considered anti-competitive. Examples of prohibited actions include:

- **Price-fixing** – an agreement between or among competitors to fix, raise or lower prices is illegal. Employees must not share company pricing information with non-employees.
- **Market Allocation** – employees are prohibited from agreeing with a competitor to divide markets or customers.
- **Favoritism** – employees should not treat one customer differently from another or otherwise demonstrate favoritism in purchasing policies or practices.

The penalties for antitrust violations can be serious for both the company and any individuals involved; penalties can include monetary damages, fines, and criminal legal action.

Copyright Laws

**Publications:** The copyright laws prohibit, with limited exceptions, the reproduction or copying of written or published materials without the specific permission of the author. Employees who improperly copy or use unauthorized copies of printed materials or the printed copies of online publications will be subject to disciplinary action; in addition, you could be subject to civil damages for such actions.
Software: The company purchases and/or licenses a variety of computer programs for business purposes. Unless specifically allowed by the software developer, we cannot make copies of the software we use. Employees are not allowed to make copies of software programs the company uses; illegal reproduction of software is subject to disciplinary action, as well as possible civil and criminal penalties. In addition, employees are not allowed to download any software onto company devices – computers, laptops, smart phones, etc. – unless specifically given permission by their supervisor and the company’s Information Technology Department.

Company Reporting

All company financial transactions must be honestly and properly documented and recorded, in conformity with all laws and regulations. The company has in place policies and monitoring systems to provide assurance that all company related documents and records accurately reflect the results of operations and clinical care. With the exception of petty cash funds, payments on behalf of the company should not be made in cash.

Federal Medicare and Medicaid law requires that the company retain books, records, and documents necessary for the verification of services provided and billed for. The company must fairly and honestly record its costs and apportion its costs in order to comply with federal and state law regarding the company’s cost reports.

The company is also responsible for the prompt reporting and return of funds from any credit balance or overpayment, regardless of the source. If you come across a credit balance in the course of your work, you are obligated to report it to your supervisor.
Government Investigations

The company has a policy of cooperating with all governmental inquiries, requests for information, or investigations.

In order to ensure the company is able to accurately and efficiently respond to an inquiry or investigation, you are required to immediately notify your supervisor, a member of the Legal Department, or a member of the Compliance Department. Be sure that you communicate with someone timely, do not rely on leaving a voicemail to provide the company notice of any of these activities.

If you are approached by someone claiming to be an investigator for a state or federal agency (or any organization other than the company), please request to see proper identification, obtain the individual’s name, agency, and phone number (please do not attempt to photocopy an individual’s credentials as it may be illegal); please write this information down and pass the information along to your supervisor or member of the legal department, inform the individual that the company’s policy is to cooperate and that someone will be in prompt contact with the individual.

It is expected that you will not disclose any information to an auditor or investigator without first contacting the Legal Department or the Compliance Department. In addition, you have the right to speak with an attorney before you respond to an investigator’s questions. Seeking the advice of an attorney or the company’s general counsel does not in any way suggest improper conduct.

To comply with your ethical obligation, you must not:

- Lie or make false statements to a government auditor or investigator;
- Destroy or alter documents or records; or
- Attempt to persuade another employee to either make a false statement or destroy or alter records.
Conflicts of Interest

A conflict of interest may arise when you as an employee have a personal interest or activity that influences your judgment in the performance of your duties, or when you place your own interests over the interests of our residents or the company.

There are two steps that are necessary to help resolve a potential or actual conflict of interest. First, you need to disclose the conflict or perceived conflict of interest to your supervisor; second, you must remove yourself from participating in any decisions regarding the resolution of the conflict issue. You have a duty to disclose a conflict or perceived conflict; if you fail to do so, you will be subject to disciplinary action, up to and including termination. If you have a question about a situation that may be a conflict of interest, you should talk to your supervisor or a member of the Compliance Department for guidance.

The following list contains examples of potential conflicts you may encounter, but this should not be considered an exhaustive list:

- You or a family member have a financial interest with a competitor or vendor that would cause you to put your interest or the interest of your family member ahead of your duty to the company; for example, a family member owns a service provider and you are responsible for making a decision as to which vendor is hired to provide those services to the company.

- You accept outside employment that interferes with your commitment to the company’s professional standards; for example, you are a nurse or nursing assistant and work for both the company and a local hospice. While you are not prohibited from working for more than one employer, your work schedule for another employer should not interfere with your commitment to working for the company.

- You make a hiring decision based on a personal or family relationship with the person hired; for example, you hire your sister for a position at the center where you work. While the company does not prohibit family members working for the company, even at the same center, a family member should not make the hiring decision regarding a family member.
Supervisors: you are required to work with your own supervisor in dealing with the conflict of interest, including notifying the Regional Vice President of Operations. In addition, you may utilize the compliance team as a resource to develop a course of action to deal with the conflict of interest.

Company Property and Information

Company property, which includes items ranging from office supplies and food in the kitchen to company information, must only be used for legitimate business purposes. Each of us has a responsibility to safeguard company assets, as it is these very assets we use to provide the high level of care to our patients and residents. Company information is a proprietary resource that also must be kept confidential and handled with care, and must not be released to anyone outside the company.

All communication systems are also considered company property and must be used primarily for business purposes. Limited reasonable personal use of company communications equipment – either phone or computer/internet – is permitted; however, employees should assume that any communications using company property or equipment is not private. You should hold no expectation of privacy in anything created, stored, sent, or received on a company computer or telephone system. The company also reserves the right to monitor and access communications, usage, and content.

Contracting Practices

It is expected that prior to entering into any contract, approval be obtained from the Legal Department. All contracts entered into on behalf of the company shall be in writing and signed by an authorized executive. No one should attempt to bind the company with a verbal agreement.

In many cases, the company has standardized contracts that have prior approval; these may be obtained from the legal department. This applies to both the center level contracts and corporate level contracts.
Each contract should contain a clear description of the expectations and the goods or services to be provided. Fees should be clearly described and consistent with normal industry practices. For many contracts, a business associate agreement may be required. If you need guidance as to whether a Business Associate Agreement is required, please email the Legal Contracts Department for guidance at legalcontracts@consulatehc.com.

The company has a system of pre-approved purchasing agreements in place to assist you in providing quality cost-effective services to our patients and residents. If you determine that you need to go outside these pre-approved agreements, you are required to follow the guidelines set up for such situations. Those guidelines include gaining pre-approval and review of the new vendor, which includes verifying that the vendor is not listed on the Department of Health and Human Services Office of Inspector General List of Excluded Individual/Entities or the General Services Administration Excluded Parties List System. If you fail to follow these procedures, you could face disciplinary action.

Political Contributions and Contact with Government Officials

Contributions: The Company encourages all employees to take an active interest and participate when possible in political affairs. If you choose to participate, you should do so only as an individual, on your own time, and not act in any way that may be construed as representing the company. Employees may not perform campaign activities on Company time and are prohibited from using company property or resources for such activities. The Company will not directly or indirectly reimburse or otherwise compensate any person for his or her personal political contributions.

The Company may contribute to a candidate(s) or a campaign(s) that aligns with the company’s business objectives and public policy goals as permitted by Federal and State law.
Contact with Government Officials: Federal law and the laws of most states prohibit the giving of anything of value to a government official with the intent to influence that official’s decisions. Therefore, employees are strictly prohibited from giving gifts, gratuities or anything of value to influence a government official or to advance a particular business. This prohibition covers anything of value including meals, entertainment, travel, lodging, and any other items of value to the recipient.

Employment Practices

The company is committed to fair employment policies and results for all employees. To help further this commitment, every employee must comply fully with the guidelines set out below, as well as all employment laws and policies.

Equal Opportunities: The Company is an equal opportunity employer. We will provide each employee and job applicant with equal opportunities for employment, promotions, evaluations, and compensation, as well as equal treatment for disciplinary actions. These opportunities or actions will be provided without regard for an individual’s race, color, ancestry, sex, pregnancy, sexual orientation, religion, national origin, marital status, familial status, age, disability, union membership or non-membership, or any other legally protected class or category. Discrimination will not be tolerated. Any employee who feels they have suffered any form of discrimination is encouraged to immediately report such allegations; employees who do discriminate will face disciplinary action.

Harassment: We are all responsible for our own conduct and each of us plays a part in creating an atmosphere of professionalism. The company is committed to having a work environment that is professional and free of any form of harassment. Workplace conduct includes your actions, verbal and electronic communications, and extends to activities that are an extension of our work environment (off-site company functions or certain comments or actions made in public that relate to the company).
The company will not tolerate:

- Harassment based on an individual’s protected status (i.e. race, color, sex, religion, national origin, marital status, age, disability, or any other protected class).
- Unwanted or inappropriate physical, verbal, or sexual conduct (i.e. crude or vulgar language, inappropriate photos, suggestive gestures or uninvited contact).
- Any other conduct that creates an intimidating or hostile work environment.

No Retaliation: The company will not tolerate any form of retaliation against anyone making a good faith allegation or report of discrimination or harassment. This policy, as discussed earlier in the Code, applies to more than situations of harassment or discrimination. If you make a good faith report and you feel that a fellow employee or supervisor is acting against you for retribution, you should report these allegations just as you did your initial concerns. A violation of company policy and the law regarding retaliation is taken as seriously as the underlying concern that caused you to report in the first place.

Employee Screening

The company utilizes a number of employee screening methods to protect the integrity of our workforce and protect our residents and patients.

It is company policy to require a drug test, reasonable background investigation, and reference check for all job applicants. The company will not hire, nor continue the employment of, anyone who has a positive drug test; who does not have the proper authorization to work legally in the United States; or who has been convicted of a job-related and/or legally disqualifying felony, violent crime, or a crime of fraud, abuse, or neglect toward patients.
In addition, every employee is checked upon hire and thereafter routinely checked against the Department of Health and Human Services Office of Inspector General List of Excluded Individual/Entities and the General Services Administration Excluded Parties List System. Any individual who is found to be an excluded individual cannot be employed by the company as federal health care programs prohibit the employment of excluded individuals.

If your job requires a license or certification, you will be required to provide proof of the license or certification upon hire. You are also required to maintain your credentials in accordance with state and federal laws.

**Substance Abuse**

The use, manufacture, sale, or possession of a controlled substance or alcohol at work is strictly prohibited. You are also in violation of company policy if you come to work under the influence of alcohol or illegal drugs. For employees who have work performance issues that may be related to alcohol or drugs, a drug screen may be administered and appropriate disciplinary action taken. If warranted, law enforcement will be contacted.

**Workplace Health and Safety**

We want to maintain a safe and healthy work environment for the benefit of our residents and our fellow employees. Safe working practices are to be followed at all times to prevent accidents and prescribed safety and protective equipment must be used. These practices are in place to prevent injuries to both staff members and to residents. During your orientation and ongoing training, you will learn about specific safety and health practices for your job.

The company is required to provide a work environment free from recognized hazards. You are also responsible for helping to maintain the safety of your work environment. Immediately notify a supervisor if you notice anything that may be a threat to the health or safety of a resident, employee, or anyone else.
Commitment to Compliance

You are a vital part of the company’s compliance program ensuring that we abide by our ethical and legal obligations. A successful compliance program is critical to our company’s financial success and the delivery of excellent care to our residents and patients.

Our actions are being watched by an ever increasing group of consumers and government agencies. To secure our continued success, we must become our own best watchdog to ensure that potential issues of fraud, waste, and abuse are identified before they happen. If they do occur, we must report them so the company can deal with such issues appropriately.

The Code of Ethics is the cornerstone of our compliance process and sets the standards for ethical, legal, and professional conduct. Yet, this is just the beginning of that process. The steps you take every day are the embodiment of those standards and demonstrate our commitment to compliance and providing the highest quality of care for our patients and residents. Thank you for all that you do to advance our commitment of providing excellent care to our patients and residents.
COMMITMENT TO COMPLIANCE CERTIFICATION

Company: ________________________________

Center/Region: ________________________________

I hereby certify that I have received a copy of the company’s Code of Ethics. I further certify that I have read the Code, understand its contents and will abide by its obligations. I understand that adherence to the Code of Ethics is a requirement of my employment.

I also understand that should I have any questions regarding the Code or any activity or issue related to the Code, it is my duty to seek advice from appropriate company officials.

Date: ________________________________

Employee: ________________________________  Witness: ________________________________

Signature  Signature

Print Name  Print Name

For Information Purposes Only
Forms for signature are available from your Human Resources Representative.