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**COMMITMENT TO COMPLIANCE AND ETHICS CODE OF CONDUCT AND  
COMPLIANCE AND ETHICS PROGRAM SUMMARY**

**Adopted**

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## **COMMITMENT TO COMPLIANCE AND ETHICS**

The Facility is engaged in the business of providing high-quality skilled nursing care to its residents in a manner that conforms with the highest standards of ethical behavior and care. The Facility and any and all directors, officers, clinical staff, employees, independent contractors, consultants, and others working for the Facility (“Associates”) constantly strive to ensure that all activity by, on behalf of or with the organization complies with all applicable federal, state, and local Laws, Regulations, ordinances, administrative directives, and any other binding governmental directives (“Laws and Regulations”).

The Facility is committed not only to providing residents with the high quality and caring medical services necessary to attain or maintain the resident’s highest practicable physical, mental, and psychological well-being, but also to provide those services pursuant to the highest ethical, business, and legal standards. These high standards apply to our interactions with everyone with whom we deal. This includes our residents, the community, other healthcare providers, companies with whom we do business, government entities to whom we report, and the public and private entities from whom reimbursement for services is sought and received. In this regard, all personnel must not only act in compliance with all applicable legal rules and regulations, but also strive to avoid even the appearance of impropriety. While the legal rules are very important, we must hold ourselves up to even higher ethical standards.

The Facility does not, and will not, tolerate any form of unlawful or unethical behavior by anyone associated with the Facility. We expect and require all Associates to be law-abiding, honest, trustworthy, and fair in all of their business dealings. To ensure that these expectations are met, the Facility has prepared a comprehensive Code of Conduct and standards of conduct. The Code of Conduct and standards are designed to assist you in navigating the various compliance and ethics obligations of the highly regulated industry in which we do business. By adhering to the Code of Conduct and standards, you enable the Facility to continue to achieve its goal of providing excellent service to our residents in a legal and ethical fashion.

In addition, as part of the Facility’s commitment to health care fraud and abuse and regulatory compliance, and in an effort to assist the Facility’s personnel in meeting their compliance and ethics obligations, the Facility has

established a Compliance and Ethics Program. The Compliance and Ethics Program is designed to implement the Code of Conduct and prevent violations of applicable laws and regulations and, where such violations occur, to promote their early and accurate detection and prompt resolution through education, monitoring, disciplinary action, and other appropriate remedial measures.

Because of the importance of the Compliance and Ethics Program, we require that all Associates cooperate fully. All Associates will be given a copy of this Code of Conduct ("Code"), and will be required to review and become familiar with its contents. In addition to this Code, the Facility will provide its Associates with formal training regarding the Code of Conduct and Compliance and Ethics Program policies. The Compliance and Ethics Program standards and policies will be maintained by the corporate compliance and ethics officer and will be made available to all personnel upon request. All the Facility Associates shall adhere to the high standards of business ethics as set forth in the compliance and ethics program and in its Code, and acknowledge that such compliance and ethics is a condition of employment and is a factor that will be considered in his or her performance evaluation. Any conduct by an Associate that runs contrary to the Facility's expectations regarding the Compliance and Ethics Program will be considered a violation of the compliance and ethics program and related policies and procedures and the Associate will be subject to a range of disciplinary measures.

## **I. CODE OF CONDUCT**

This Code of Conduct is intended to articulate general principles in order to provide guidance to Associates in their obligation to comply with applicable Laws and Regulations. The general principles contained in this Code, however, are neither exclusive nor complete. Associates are therefore expected to refer to the Facility's compliance and ethics program, manuals, policies and procedures, as well as other relevant Laws and Regulations for further guidance. It is critical for all Associates to recognize that they are required to comply with all applicable Laws and Regulations, as well as the Facility's compliance and ethics program, manuals, policies and procedures, whether or not specifically addressed in this Code of Conduct. Any questions regarding the existence of, interpretation or application of any law, regulation, rule, standard, policy and/or procedure that arise should be directed to the Facility's Compliance and Ethics Officer.

The Facility has adopted the following Code as a central part of our compliance and ethics program. Everyone should adhere both to the spirit and the language of the Code, maintain a high level of integrity in their conduct and avoid any actions that could reasonably be expected to adversely affect the Facility's integrity or reputation. Compliance with the Code is a condition of employment, and violation of the Standards (as defined below) will result in discipline being imposed, up to and including possible termination.

Nothing in this Code of Conduct is intended to, nor shall be construed as, providing any additional employment or contractual rights to Associates or other persons.

**A. HONESTY AND LAWFUL CONDUCT.** Associates of the Facility, including all physicians who see residents at our facility, must avoid all illegal conduct, both in business and personal matters. No person should take any action that he or she believes violates any statute, rule, or regulation. In addition, Associates must comply with the Code and departmental compliance and ethics policies and procedures, strive to avoid the appearance of impropriety, and never act in a dishonest or misleading manner.

**B. COOPERATION WITH THE COMPLIANCE AND ETHICS PROGRAM.** We require everyone to cooperate fully with the compliance and ethics program because the program is effective only if everyone works together to ensure its success and understands the requirements under the law and the Code. In particular, all departments, personnel, and physicians must cooperate with all inquiries concerning improper business, documentation, coding or billing practices, respond to any reviews or inquiries, and actively work to correct any improper practices that are identified.

**C. QUESTIONS AND CONCERNS.** Neither this Code nor our overall Compliance and Ethics Program can cover every situation that you might face. As a result, if you are unsure of what the proper course of conduct might be in a specific situation, or if you believe that this Code or any compliance and ethics standards or policies (whether set forth in here or elsewhere) may have been violated, then you are expected to contact the corporate compliance and ethics officer, who can be reached at the facility.

You may contact the corporate compliance and ethics officer at any time, either in person, by telephone, or in writing, with any compliance and/or ethics-related question or concern you may have. Questions or concerns may be raised anonymously, if you wish. All reports will be held in the strictest confidence possible, consistent with the need to investigate the matter.

**D. NON-RETALIATION AND NON INTIMIDATION** It is absolutely forbidden for any personnel to intimidate, retaliate, punish or conduct reprisals against anyone who has reported a suspected violation of a law or regulation or any the Facility policy. It is also forbidden for any personnel to intimidate, retaliate, punish or conduct reprisals against anyone who has participated or cooperated in an investigation of such matters. Retaliatory actions violate this Code and will not be tolerated.

## **II. CODE OF CONDUCT STANDARDS**

The Code provides a high-level overview of the expectations that the Facility has for all its Associates. Because Associates will be responsible for complying with this Code, the Facility has adopted the following standards of conduct (“Standards”) that all Associates are expected to follow. These Standards outline and summarize the basic concepts underlying the Facility’s Code of Conduct and its compliance and ethics program. These Standards must be carefully reviewed and closely followed by all the Facility Associates. Supplemental information relating to these Standards will be provided through periodic formal and informal training and educational programs. Additionally, many Standards are expanded in greater detail in the Facility’s compliance and ethics standards and policies.

### **A. COMPLIANCE WITH THE LAW AND HIGH ETHICAL BUSINESS STANDARDS**

The Facility operates in a heavily regulated industry and is subject to a large number of federal and state civil and criminal laws and regulations. Violation of these laws and regulations can result in harm to the public, severe financial penalties, exclusion from participation in government health care programs and – in some cases – criminal fines and/or imprisonment. The Facility’s Code of Conduct and compliance and ethics program are designed to prevent and detect such violations. Accordingly, it is critical that all Associates comply with

all applicable federal and state laws and regulations and with all policies and procedures that comprise the compliance and ethics program.

While one of the objectives of the Facility's compliance and ethics program is to educate all the Facility Associates about the basic requirements of these laws and regulations, the Facility does not expect any of its Associates to become experts in these areas. For precisely this reason, where an individual is not sure whether a particular activity or practice violates the law (or any of the compliance and ethics program policies), the individual should not – under any circumstances – “guess” as to the correct answer. Instead, the individual should seek appropriate guidance from his or her supervisor or the corporate compliance and ethics officer. The Facility Associates will not be penalized for asking compliance and/or ethics-related questions. To the contrary, the Facility is intent on creating a culture in which every individual is comfortable asking the questions necessary to ensure that he or she understands and performs his or her tasks and obligations in full.

The following is a list of legal compliance and ethics issues that can pertain to Associates. Specifically, Associates shall refrain from any illegal conduct including, but not limited to:

- a. Fraud Waste and Abuse. The Facility expects its Associates to refrain from conduct that may violate any federal and state laws relating to health care fraud and abuse. Each Associate is expected to: (1) maintain honest and accurate records of services provided; (2) follow current and applicable laws, regulations, and guidelines to facilitate proper documentation of services; and (3) take necessary steps to prevent the submission of claims for payment and reimbursement of any kind that are fraudulent, abusive, inaccurate, or medically excessive or unnecessary.
- b. Anti-Trust. Associates shall comply with applicable antitrust laws. There shall be no discussions or agreements with competitors regarding price or other terms for product sales, prices paid to suppliers or providers, dividing up geographic markets, or joint action to boycott or coerce certain suppliers or providers.

- c. Licensure/Certification. All Associates that require licenses or certifications from state or federal agencies must comply with all licensure and certification laws applicable to the Facility's operations. Such Associates are expected to participate in educational "in-services" offered by the Facility and by various professional groups and associations, and to be familiar with the laws that affect their specific job duties.
- d. Tax. The Facility and its Associates will truthfully and accurately report payments to appropriate taxing authorities, and will file all tax returns and other information in a manner consistent with applicable laws.
- e. Discrimination. It is the Facility's policy to treat residents, employees, vendors, and contractors, etc. without regard to race, color, religion, sex, ethnic origin, age, disability, or any other classification protected by law. The Facility recruits, hires, trains, promotes, assigns, transfers, lays off, recalls, and terminates Associates based on their ability, achievement, experience and conduct without regard to race, color, religion, sex, ethnic origin, age, disability or any other classification protected by law. No form of harassment or discrimination on the basis of sex, race, color, disability, age, religion or ethnic origin or disability or any other classification protected by law will be permitted. All Associates are responsible for ensuring that the work environment is free of discrimination or harassment due to sex, age, race, gender, color, religion, national origin, disability, or any other status protected under state or federal law. Each allegation of harassment or discrimination should be promptly reported to the compliance and ethics officer so that it can be investigated and appropriate action can be taken.
- f. Lobbying/Political Activity. Associates may personally participate in, and contribute to, political organizations or campaigns as individuals, not as representatives of the Facility. Associates may not make any agreement to contribute any money, property, or services at the Facility's expense to any political candidate, party, organization, committee, or individual



in violation of any applicable law. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is absolutely and completely prohibited.

- g. Kickbacks, Inducement, and Self-Referrals. The Facility and its Associates shall comply with all laws relating to kickbacks, inducements, and self-referrals. The Facility and its Associates shall not knowingly offer, pay, solicit, or receive bribes, kickbacks, or other improper remuneration in order to induce business reimbursable by any federal or state government program including, but not limited to, Medicare and/or Medicaid. All Associates are required to report any gifts or other gratuities, other than those of nominal value, received from any outside source that would stand to benefit from the referral of business to the Facility.

## **B. STANDARDS RELATING TO QUALITY OF CARE AND SERVICES**

The Facility is fully committed to providing the highest quality of resident care in accordance with all applicable laws, rules, and regulations. As part of this commitment, the Facility will ensure that necessary quality assurance systems are in place and functioning effectively.

- a. Quality of Care Principles and Resident Rights. In keeping with the Facility's mission and values, the following quality of care and services principals have been incorporated into the Facility's compliance and ethics program:
- i. All residents will receive treatment without discrimination as to race, color, religion, sex, national origin, disability, sexual orientation, source of payment, or age.
  - ii. All residents will receive information that is necessary to give informed consent for any proposed procedure or treatment. This information shall include the possible risks and benefits of the procedure or treatment.

- iii. All residents will receive considerate and respectful care in a clean and safe environment free of unnecessary restraints.
  - iv. The Facility will protect and promote the rights of each resident, including, but not limited to, the resident's right to respect, privacy, a dignified existence, self-determination, and the right to participate in all decisions about their own care, treatment and discharge.
  - v. The Facility will conduct background checks pursuant to Federal and State law on all Associates involved in resident care, or who have access to residents' possessions.
  - vi. All individuals employed by the Facility will have the proper credentials, experience, and expertise required to discharge their responsibilities, pursuant to the Facility's Employee and Independent Contractor Credentialing Policy and Procedure.
  - vii. The Facility will continuously strive toward a culture of resident safety and providing quality medical care to its residents.
- b. Mandatory Reporting. As part of its commitment to providing the highest quality of resident care and services, the Facility complies with all applicable federal and state mandatory reporting laws, rules, and regulations. To this end, the Facility will ensure that all incidents and events that are required to be reported are done so in timely manner, and will monitor compliance with such requirements. The Facility will also comply with and have policies and procedures in place relating to the reporting requirements under the Federal Elder Justice Act.

## **C. STANDARDS RELATING TO BILLING AND CODING**

- a. Billing Generally. The Facility is committed to conducting the coding, billing, and collection process with integrity pursuant to the applicable billing laws, regulations, and guidelines to facilitate the proper documentation, coding, and billing of claims. The Facility will therefore ensure that all billing conforms with all federal and state laws regarding the submission of

claims. The Facility will accurately code and bill third party payors based upon medical necessity and supporting documentation. Periodic auditing and monitoring may be necessary to ensure full compliance and ethics by the Facility. All Associates responsible for billing will be trained in the appropriate rules governing billing and documentation and will follow all regulations governing billing procedures. The Facility takes all reasonable steps to ensure that its billing software reliably and accurately codes and bills all services according to the most recent federal and state laws and regulations. Policies and training of coding and billing personnel shall focus particular attention to issues of medical necessity, appropriate diagnosis codes, prospective payment, consolidated billing, and individual Medicare Part B or Medicaid claims.

- b. Compliance with Federal and State Laws Regarding the Submission of Claims. All Associates shall comply with all applicable federal and state laws and regulations governing the submission of billing claims and related statements. A detailed description of (i) the federal False Claims Act; (ii) the federal Program Fraud Civil Remedies Act; (iii) state civil and criminal laws pertaining to false claims; and (iv) the whistleblower protections afforded under such laws is provided in the Facility's Fraud, Waste, and Abuse Policy and Procedure.

#### **D. STANDARDS RELATING TO BUSINESS PRACTICES**

All Associates must conduct their business affairs with integrity, honesty, and fairness to avoid conflict between personal interests and the interest of the Facility, and Associates have a responsibility to obtain clarification from management on questionable issues that may arise. Associates shall forego any transaction or opportunity that can only be obtained by improper and illegal means, and will not make any unethical or illegal payments to induce the use of the Facility's services. Specifically, Associates shall comply with the following standards:

- a. Honest Communication. Associates are expected to be honest and truthful with regard to the performance of their responsibilities and in communications with the Facility's attorneys, consultants, and auditors. Associates may not make

false or misleading statements to any state or federal official, investigator, or person/entity doing business with the Facility. Associates shall not destroy or alter the Facility information or documents in anticipation of, or in response to, a request for documents by any applicable government agency or from any court.

- b. Business Relationships. Associates shall not engage in any business practice intended to unlawfully obtain favorable treatment or business from any government entity or any other party in a position to provide such treatment or business. Associates shall not use confidential or proprietary information about the Facility for their own personal benefit or for the benefit of any other person or entity, except the Facility.
- i. Disclosure of Financial Interest. Associates must disclose to the Compliance and Ethics Officer any financial interest, ownership interest, or any other relationship that they or a member of their immediate family have with any of the Facility's vendors or competitors.
  - ii. Disclosure of Personal Relationship. Associates must disclose personal relationships and business activities with any vendor or contractor that may be construed by an impartial observer as influencing any of the Associates' performance or duties.
  - iii. No Use of Insider Information. The Facility and its Associates will not use insider information for any business activity conducted by or on behalf of the Facility. All business relations with vendors and contractors providing any services to the Facility will be conducted at arm's length both in fact and in appearance, and in compliance with the Facility's policies and procedures.
- c. Unfair Competition and Deceptive Trade Practices. The Facility and its Associates shall not engage in unfair competition or deceptive trade practices, including misrepresentation of the

Facility's products or operations. Associates shall not make false or disparaging statements about competitors or their products or attempt to coerce suppliers or providers into purchasing products or services.

- d. Financial Reporting. All financial reports, cost reports, accounting records, research reports, expense accounts, time sheets, and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction.
- e. Travel and Entertainment. It is the Facility's policy that no Associates should suffer a financial loss or gain because of business travel and entertainment. That said, travel and entertainment expenses must be consistent with the Associate's job duties, and Associates are expected to exercise reasonable judgment in the use of the Facility's assets.
- f. Personal Use of Corporate Assets. All the Facility business shall be conducted, and the Facility assets property utilized, in a manner designed to further the Facility's interest rather than the personal interest of an individual Associate. Associates are prohibited from the unauthorized use or taking of the Facility's equipment, supplies, materials or services and from converting the Facility assets to personal use.
- g. Gifts from Residents or Others. Associates are prohibited from soliciting or accepting tips, personal gratuities, loans, gifts, or other things of value from the Facility residents, or vendors, contractors, and any others that seek to do business with the Facility. If a resident or another individual wishes to present a monetary gift, he/she should be referred to the Compliance and Ethics Officer.
- h. Gifts Influencing Decision-Making. Associates shall not accept gifts, favors, services, entertainment, or other things of value to the extent that decision-making or actions affecting the Facility might be influenced. Similarly, the offer or giving of money, services, or other things of value with the expectation of influencing the judgment or decision-making process of any

purchaser, supplier, government official, or other person by the Facility is absolutely prohibited.

- i. Gifts from Existing Vendors or Residents. Associates may retain gifts from vendors or residents, which have a nominal value generally less than \$50 in aggregate over each year. To the extent possible, these gifts should be shared with the Associates' co-workers. Gifts of cash and cash equivalents (e.g. gift certificates) are never acceptable.
- j. Vendor or Business Associate Sponsored Entertainment. Occasionally, at a vendor's or business associate's invitation, an Associate may accept meals or refreshments, attend a local theater or sporting event, or similar entertainment, at the vendor's or business associate's expense, so long as the cost is of nominal value under the circumstances, generally less than \$50 in aggregate over each year. In most circumstances, a regular business representative of the vendor or business associate should be in attendance with the employee or contractor. Associates should advise the Compliance and Ethics Officer of vendors or business associates that offer such invitations on a frequent basis, even if the Associate does not accept such invitations.
- k. Conflicts of Interest. Associates may not use their positions at the Facility to profit personally or to assist others in profiting in any way at the expense of the Facility. Associates shall not engage in any financial, business, or other activity which competes with the Facility's business which may interfere or appear to interfere with the performance of their duties, or that involve the use of the Facility property, facilities, or resources, except to the extent consistent with the conflict of interest policies.
- l. Services for Competitors or Vendors. No Associate shall perform work or render services for any competitor of the Facility or for any organization with which the Facility does business or which seeks to do business with the Facility, without the approval of a member of the Governing Body. No Associate shall be a director, officer, or consultant of an outside organization, nor

permit his/her name to be used in any fashion that would tend to indicate a business connection with such organization without the prior approval of a member of the Governing Body.

## **E. STANDARDS RELATING TO HUMAN RESOURCES**

- a. Controlled Substances. The use, sale, or possession of controlled substances or alcohol on the Facility property is strictly prohibited, except as normal course of business, such as authorized sale of alcoholic beverages through Dining Services.
- b. Criminal Background Checks. The Facility shall comply with provisions of the Elder Justice Act contained within the Patient Protection and Affordable Care Act, Pub. L. 111-148, 124 Stat. 199 ("EJA"). To this end, the Facility shall not hire an applicant, or retain an Associate who has violated the reporting requirements of the EJA.
- c. Occupational Health and Safety Act. The Occupational Safety and Health Act (OSHA) requires employers to provide a work environment that meets certain safety and health standards. The Facility takes this responsibility seriously. We provide periodic education programs addressing the requirements of OSHA. Associates are required to comply with established facility policies and procedures designed to meet these guidelines. An Associate who identifies a known or suspected workplace hazard must report it immediately to his/her supervisor.
- d. Sexual and Other Forms of Harassment. The Facility is committed to maintaining a professional work environment that is free from sexual and other illegal harassment, which can include harassment based on race, color, religion, sex, sexual orientation, national origin, age, disability, or any other classification protected by law. Any illegal harassment of any individual by any Associate(s) is prohibited and will not be tolerated. Sexual harassment consists of both direct and indirect actions that create a hostile work environment.

## **F. STANDARDS RELATING TO CONFIDENTIALITY**

The Facility safeguards confidential information regarding its residents, such as individually identifiable health information, and confidential and proprietary information regarding the Facility's business, such as resident lists, development plans, marketing strategy, financial data, proprietary research, and information about pending or contemplated business deals. Inappropriate disclosure of the Facility's confidential business information, whether intentional or accidental, may adversely affect the Facility.

Associates shall not steal information belonging to another person or entity – including information belonging to the Facility – or use any publication, document, computer program, information, or product in violation of a third party's interest in such product. All Associates are responsible for ensuring that they do not improperly copy documents or computer programs in violation of applicable copyright laws or licensing agreements for their own use. Associates shall not use confidential business information obtained from competitors or pre-employment agreements, in violation of a covenant not to compete, or in any other manner likely to provide an unfair competitive advantage to the Facility.

Associates who learn confidential business information about the Facility or its residents shall not disclose that information to third parties, including family or friends, except with the prior written consent of the Facility, or as required by applicable law.

### **III. EDUCATION**

The Facility will develop and implement a regular education and training program for all Associates. All Associates are expected to participate in educational programs and abide by policy requirements. Adherence to the Facility's Compliance and Ethics Program will be a factor in evaluating the performance of an Associate. The Facility will maintain records of all educational programs presented to Associates.

### **IV. OVERSIGHT BY COMPLIANCE AND ETHICS OFFICER**

The Facility Compliance and Ethics Officer will report to the Facility's Governing Body (or an appropriate member of the Governing Body). The Compliance and Ethics Officer shall review all material issues of interpretation of this Code of Conduct with the Governing Body or appropriate committee of the Governing Body.



## V. REPORTING OF VIOLATIONS

- A. Illegal acts or improper conduct may subject the Facility to severe civil and criminal penalties, including large fines and being barred from certain types of federally funded insurance programs and businesses. It is, therefore, crucial that any illegal activity or violations of the Code be promptly brought to the attention of the Corporate Compliance and Ethics Officer. In many cases, if the Facility discovers and reports illegal acts to the appropriate governmental authorities, the Facility may be subject to lesser penalties.
- B. Any Associate who believes or becomes aware of any violation of this Code or any illegal activity by any other Associate or person acting on the Facility's behalf shall promptly report the violation or illegal activity in person, by phone, or in writing, to (i) the appropriate supervisor; (2) the Administrator; (3) the Compliance and Ethics Officer; or (4) the compliance and ethics hotline at 800-610-2544.
- C. Associates who do not report a violation of the Code or any known or suspected illegal activity will have violated this Code. Associates that have questions about whether particular acts or conduct may be illegal or violate the Code, have a duty to contact the Compliance and Ethics Officer to get clarification.
- D. High-level Associates to whom illegal activity or violations of this Code are reported to have a responsibility to ensure that such activity is properly investigated. Neglecting to properly investigate such reports shall be a violation of this Code. All Associates receiving any such reports are required to report such issues to the appropriate compliance and ethics personnel such as the Compliance and Ethics Officer or his/her designee(s).
- E. It is the Facility's policy to promptly, thoroughly, and comprehensively investigate reports of illegal activity or violations of this Code. Associates must fully cooperate with these investigations and shall not take any action to prevent, hinder, or delay discovery and full investigation of illegal acts or violations of this Code.
- F. Associates may report illegal acts or a violation of this Code anonymously. To the extent permitted by law, reasonable

precautions will be taken to maintain the confidentiality of those individuals who report illegal activity or violations of this Code and of those individuals involved in the alleged improper activity, whether or not it turns out that improper acts occurred. Failure to abide by this confidentiality obligation shall be a violation of this Code.

- G. No reprisals, intimidation, retaliation, or disciplinary action will be taken or permitted against Associates for good faith reporting of, or cooperating with the investigation of, illegal acts or violations of this Code.

## **VI. DISCIPLINARY ACTION**

Associates who violate this Code or commit illegal acts are subject to discipline up to and including dismissal. Associates who report their own illegal acts or improper conduct, however, will have such self-reporting taken into account when determining the appropriate disciplinary action.

## **VII. CONCLUSION**

This Code of Conduct reflects standards that the Facility believes to be in the best interest of its residents, employees, contractors, vendors, and others with whom it does business. However, in addition to the specific directives set forth in this Code of Conduct, each Associate's own individual judgment is critical in determining the correct course of action for a particular situation. As each Associate contemplates a situation, the Associate should consider whether the proposed action or inaction is consistent with the Facility's practices and whether it conforms to the letter and the spirit of this Code of Conduct. Additionally, whenever an Associate sees a situation in which the purpose of this Code of Conduct does not appear to be served, the Associate should bring the concern to the attention of the Compliance and Ethics Officer.

The Facility thanks you for your cooperation with this Code of Conduct and for upholding the high standards of the Facility.