

## **ABOUT THE CORPORATE CODE OF CONDUCT**

Presby's Inspired Life has a commitment to conducting its activities in accordance with the highest level of business and community ethics, and in compliance with applicable governing laws. The maintenance of impeccable standards of honesty, integrity, impartiality, and conduct is essential to assure the retention of the residents' and the public's trust in Presby. The preservation of that trust and of Presby's reputation requires close observance of these standards on the part of its directors, officers, team members and agents. Presby affirms that it will operate under the highest ethical and moral standards, and that its activities comply with the applicable legal requirements in this Plan.

Presby has developed a Code of Conduct to provide standards by which all Presby team members will conduct themselves in order to protect and promote organization-wide integrity, and to enhance Presby's ability to live its mission fully. Compliance with the Code of Conduct will be the responsibility of every manager, officer, team member, agent or representative of Presby. Presby's Code of Conduct provides the guiding standards for our decisions and actions as members of the Presby community. **The Code cannot cover every situation in the daily conduct of our many varied activities nor substitute for common sense, individual judgment or personal integrity.**

### **Our Code of Conduct**

**Presby's Inspired Life, as a mission-driven, values-based organization, is guided in its conduct by a set of nine principles that ensure our ethical strength and overall excellence in the way we do business. As an organization, Presby dedicates itself to these principles in its decision-making and actions. As part of the Presby team, individual team members commit to these principles in their day-to-day life in the organization. Our guiding principles are as follows:**

- **Principle 1: Integrity.** Presby is committed to ensuring integrity in all activities conducted by or on behalf of the organization and promote honesty and transparency in all levels of interaction within the organization and between the organization and its constituencies.
- **Principle 2: Legal Compliance.** Presby is committed to ensuring all activity by or on behalf of the organization is in compliance with applicable federal, state and local laws.
- **Principle 3: Business Ethics.** Employees, officers and managers will accurately and honestly represent Presby and will not engage in any activity or scheme intended to defraud anyone, including federal, state or local governments, of money, property or services.

- Principle 4: Confidentiality. Presby team members will maintain the confidentiality of resident information and other confidential information in accordance with applicable legal and ethical standards.

Principle 5: Conflict of Interest. All managers, officers, team members and other representatives will report any potential conflicts of interest. A potential conflict exists whenever a manager, officer, team member or other representative has an outside interest, direct or indirect, which conflicts with the individual's duty to Presby or adversely affects the individual's judgment in the discharge of his or her responsibilities to Presby.

- Principle 6: Business Relationships. Business transactions with ancillary providers, vendors, contractors and other third parties will be conducted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.
- Principle 7: Protection of Assets. All team members will preserve and protect Presby's assets by making prudent and effective use of Presby resources and properly and accurately reporting the organization's financial condition.
- Principle 8: Reporting Suspected Misconduct. All managers, officers, team members and agents have an obligation to report suspected violations of any statute, regulation or guideline applicable to any federal, state and local health care program or of Presby's own Policies and Procedures.
- Principle 9: Relationships with Residents and Team Members. In furtherance of Presby's commitment to its standards of care and to creating positive work environments, team members and agents will demonstrate professionalism, integrity and respect in relating to residents and to one another.

At Presby's Inspired Life, we dedicate ourselves to exemplary ethical conduct and to living these principles every day.