

A. CODE OF ETHICS (applies to all employees)

EXECUTIVE, CLINICAL, OPERATIONS, ADMINISTRATIVE,
FINANCIAL AND CLERICAL EMPLOYEES:

1. Odyssey House Records

Odyssey House books and records must accurately reflect all measurable transactions affecting the corporation, including the disposition of corporate assets and time sheet reporting of hours worked. In particular, all bank and other accounts containing corporate funds shall be established and maintained in the name of Odyssey House, Inc. and all transactions and accounts involving corporate funds shall be clearly and accurately identified in books and records of Odyssey House. Staff will not participate in or condone, any actions which will result in the presentation of fraudulent financial reports or records of Odyssey House.

2. Compliance with Laws

Staff must follow the many laws, regulations, judicial decrees and orders applicable to the corporation or any of its property, employees, or actions. While this Code of Ethics refers to some specific legal areas, it cannot comprehensively note all applicable requirements. Nevertheless, all employees are responsible for complying with all applicable legal requirements. Staff are encouraged to seek advice from counsel or the Human Resources Department concerning compliance with such requirements.

3. Confidential Information

Some of the most valuable assets of Odyssey House include non-public information relating to Odyssey House. Staff will at all times during the period of their employment and thereafter keep in confidence all non-public information in compliance with the Confidentiality Agreement signed at the time of employment.

4. Conflicts of Interest or Violation of Trust Policy

Odyssey House requires that employees act in the best interest of Odyssey House at all times and that employees shall not take advantage of their positions with Odyssey House for private advantage or gain or for the advantage of any family members, friends or acquaintances. This policy requires employees to

avoid any interest or activity which might create or appear to create a conflict with their duty to Odyssey House or a violation of Odyssey House trust in its employees.

Generally, employees should avoid situations which:

- interfere with the independent exercise of judgment in the performance of duties.
- Conflict with the best interests of Odyssey House.
- Reflect unfavorably upon the good name of Odyssey House.
- Divide business loyalty between Odyssey House and an outside interest.

If any situation arises which might involve an actual or potential conflict or if you need guidance concerning this policy, discuss the matter on a confidential basis with your supervisor who, in turn, may discuss the matter with the Chief Financial and Administrative Officer. If your supervisor determines that an actual or potential conflict may exist, the supervisor will establish a remedial course of action with you and document both the problem and solution by providing a written summary to you and Human Resources.

The duty to report actual or potential conflicts is a continuing obligation since an activity which was initially free of conflicts may become a conflict because of changed circumstances. Please refer to the attached list of examples of situations that should be avoided by employees. This list is not exclusive or exhaustive. Each situation should be considered based on its own facts. In this regard, employees should be sensitive to situations in which a family member or friend's involvement may give rise to conflict of interest for the employee.

Any employee who violates this policy or does not follow the remedial course of actions will be subject to disciplinary action, including possible termination of employment.

EXAMPLES

- i. An investment in any actual or potential supplier, including contractors and other providers of services to Odyssey

House of any kind other than investments in securities listed on a national securities exchange or periodically traded over the counter.

- ii. Lending money to, or borrowing money from, any client or supplier, other than a bank or financial institution.
- iii. Use of Odyssey House resources or your position with Odyssey House to advance outside business for personal interests.
- iv. Seeking or accepting any gift, entertainment, service, lodging, favor, payment, or other compensation from a client, supplier, or other person or entity, for which payment is or may be interpreted as having been offered in an attempt or as part of an attempt to influence your conduct or actions as an employee.
- v. Furnishing any services to any actual or potential supplier to, or competitor of, Odyssey House.
- vi. Use or disclosure of information, which has not been publicly announced by Odyssey House, relating to its activities or plans for the benefit of anyone other than Odyssey House.
- vii. Representation of Odyssey House in any transaction or activity in which the employee knows that a relative, friend, or acquaintance has a significant interest.
- viii. Engaging in outside activities that interfere with the proper and efficient discharge of duties.
- ix. Acceptance of a directorship or other position in any organization which has a mission in substantial competition or conflict with Odyssey House.
- x. Signing any document or form on behalf of Odyssey House in blank or without being satisfied that it is completed correctly.

5. Health and Safety

It is the policy of Odyssey House to comply fully with all applicable health and safety laws and regulations. Every employee has responsibility for attaining and maintaining a safe work environment, and each employee is expected to perform

his or her duties in accordance with all health and safety laws, regulations and corporate policies. All staff are responsible for immediately bringing to his or her supervisor's attention any hazardous condition in the workplace and any other suspected violation of health and safety laws and regulations.

6. Odyssey House Property

Staff are expected to refrain from the personal use of, acquisition or misappropriation of Odyssey House services, facilities, materials, equipment or other assets unless advance authorization is obtained. The use, acquisition, disposal, or liquidation of corporate assets and services will be authorized only when it is in the best interests of Odyssey House. Employees are personally accountable for corporate funds, facilities, services or equipment over which they have control. Taking or using corporate services, facilities, or property for personal use without appropriate authorization or approval or without a valid business reason is prohibited. Expenses properly incurred in conducting Odyssey House business must be promptly accurately documented. No corporate funds or assets shall be used for illegal purposes.

CLINICAL:

In addition to the above ethical requirements, the following codes must be observed by all clinical staff:

All clinical staff are required to uphold the World Federation of Therapeutic Communities Staff Code of Ethics, which is discussed in the orientation process.

The primary obligation of all staff is to ensure the quality of services to residents in treatment. The relationship between the staff and the resident is a special one and it is essential that staff have both the maturity and the ability to handle the responsibility entrusted to them.

All staff must be aware that they are part of a profession which must carefully monitor its own activities and those of its residents. This Code of Ethics relates to staff all all times, both at and away from work.

Staff Members must:

1. Conduct themselves as mature and positive role models.
2. Maintain all resident information in the strictest confidence with regard to all applicable laws and agency rules.
3. Provide all residents with a copy of the “Resident Bill of Rights” and ensure that all aspects are understood and implemented by both staff and the residents.
4. Respect all residents by maintaining non-possessive, non-punitive, and professional relationships with them.
5. Provide service regardless of race, creed, religion, gender, national origin, sexual preference, age, disability, political affiliation, previous criminal record, or financial status.
6. Recognize that the best interest of the resident may be served by referring that person to another agency or professional.
7. Not engage in any sexual relationship of any kind with any resident.
8. Prevent the exploitation of residents for personal gain.