

Code of Conduct Policy

To ensure the highest ethical standards and quality of care, commit to compliance with all applicable state and federal laws and to detect and prevent criminal conduct Abri Health Care Services holds the organization and others accountable to certain expectations and responsibilities. Abri Health Care Services communicates these expectations and responsibilities by continuing education, policies, and procedures, and otherwise to team members, contractors, companies, agencies, and all others that provide care to Abri Health Care Services residents on behalf of Abri Health Care Services (collectively "Team Members"). Abri Health Care Services further ensures the suitability of Team Members, physicians, physician's extenders, contractors and the agents and applicants by screenings and reference checks and on-going monthly and annual screenings. By doing so, Abri Health Care Services ensures that they are eligible for their positions, and that they will successfully meet the highest ethical standards, provide the highest quality of care, and comply with all applicable state and federal laws. Abri Health Care Services has zero tolerance for fraud or abuse and all individuals are responsible for immediate reporting of suspected wrongdoing.

Abri Health Care Services Core Values – I*CARE – Integrity, Collaboration, Accountability, Respect, Excellence

To further meet the goals under this policy, Abri Health Care Services:

- submits only claims for payment that accurately reflect rendered services,
- uses accurate billing codes,
- markets in a manner that is honest, informative and non-deceptive,
- maintains the highest level of confidentiality,
- refrains from generating referrals to itself,
- trains Team Members annually on HIPAA and their corresponding obligations,
- encrypts resident confidential information on all laptops and portable storage devices,
- ensures that all resident records are handled, stored and transported in a strictly confidential manner and in accordance with all applicable laws,
- trains Team Members annually on recognizing and not engaging in conflicts of interest,
- requires Team Members to report concerns and suspected violations of this policy and potential wrongdoing,
- posts "May We Help You with Your Concerns" posters in a public location in all facilities,
- posts a "Hotline" telephone number 1-855-374-4613 to report or address suspected policy violations, compliance or ethics issues,
- maintains, administers, audits and enforces Operational Policies and Procedures, an Internal Audit Program, a Compliance and Business Integrity Policy, and a Fraud, Waste and Abuse - False Claims Policy,
- maintains a Corporate Compliance Officer and Corporate Compliance Committee for oversight purposes, and
- prohibits Team Members from accepting payments, bribes, rebates and/or gifts induce or reward referrals of items or services that are reimbursed by a federal health care program thereby limiting financial incentives in accordance with the Anti-kickback Statute set forth by the Social Security Act.



All team members, physicians, physician's extenders, contractors and their agents must continually and without exception meet and follow the **Mission Statement** as set forth below.

Team Members must also:

- be honest, courteous, accurate and professional in all of their daily interactions with residents, families and fellow team members,
- treat others as you expect to be treated, with dignity and respect,
- follow all policies and procedures,
- obey local, state, and federal laws,
- follow the chain of command when addressing problems, (defined as immediate supervisor, department manager, Administrator, corporate office),
- follow the provisions of the Team Members Handbook,
- refuse all gifts, tips, or compensation from residents, families and vendors,
- refuse any remuneration for any referrals to or from outside vendors or sources, and report any offer to your supervisor or the Corporate Compliance Officer,
- refrain from submitting false claims for services not performed in accordance with the False Claims Act,
- refrain from engaging in any activity which is fraudulent or in violation of any laws relating to providing care or receiving reimbursement from Medicare, Medicaid or other reimbursement programs,
- refrain from dishonest or fraudulent billing or documentation practices,
- report any suspected illegal activity or violations of Abri Health Care Services policies and procedures to your supervisor or the Corporate Compliance Officer,
- refrain from the abuse or neglect of, and/or crimes against residents,
- honor all residents' rights and assure confidentiality and privacy,
- comply with all HIPAA requirements,
- electronically protect all resident data and report any breach of data immediately
- immediately notify the Corporate Compliance Officer of any claim that a Team Member suspects does not adhere to the False Claims Act, and
- visit the Fraud, Waste and Abuse – False Claims Act Policy posted at www.abrihealthcare.com

Notwithstanding this non-exhaustive list, Team Members should also represent and meet the spirit and intentions of this policy, ensure the highest ethical standards, provide the highest quality of care, and comply with all applicable state and federal laws. Abri Health Care Services will not retaliate against any individual for responsible lawful reporting of wrongdoing and will investigate all reports.