

**GREATER OREGON BEHAVIORAL HEALTH, INC.**  
**CODE OF CONDUCT**

**Who the Code of Applies To**

The GOBHI Code of Conduct applies to all GOBHI employees, business associates and board members.

**Commitment to our Employees**

We will provide a work environment that supports honesty, integrity, respect and trust in the treatment of every worker. Harassment or discrimination of any kind is unacceptable in the workplace and will not be tolerated.

We are also committed to providing a safe, healthy, drug-free work environment. Your obligation is to comply with health, safety and environmental regulations. You should report any accident or injury sustained on the job immediately, and feel free to discuss any environmental or safety concerns with a member of the management staff.

**Ethical Conduct and Compliance**

In the performance of our duties, our staff is expected to set an example of ethical behavior, and to comply with all laws and regulations that govern our business.

We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

**Business and Financial Information**

Accuracy, Retention and Disposal of Documents and Records

You are responsible for the integrity and accuracy of any organizational documents or records that you write or modify. Falsifying or altering documents or records is absolutely prohibited.

You're also expected to become familiar with and comply with GOBHI policies that address the retention and disposal of our organization's documents and records.

Financial Reporting and Records

In order to provide accurate, reliable financial records, all financial transactions shall be recorded promptly and according to generally accepted accounting principles and GOBHI policies and procedures. We have implemented internal controls to provide reasonable assurance that management has authorized a transaction and that it has been recorded properly.

## Encountering Services

We shall submit encounter data only for services that are supported by evidence that they have actually been rendered. Presentation for payment or approval of any claim that is false or fraudulent will not be tolerated.

## **Workplace Conduct**

### Confidentiality of Business and Member Information

It is your ethical duty to protect the confidentiality of information about GOBHI business plans and practices. When in doubt about whether or not you may share such information, contact the GOBHI chief executive officer or corporate integrity officer.

You are also expected to comply with GOBHI policies and procedures regarding the confidentiality of member health information. Identifiable member information shall not be shared with others who do not have a legitimate need to know in order to perform their specific job or carry on business. The use of member, worker or any individual's or entity's information for personal benefit is absolutely prohibited.

### Treatment of Others

GOBHI prohibits all forms of discrimination, including harassment of any kind. Members of the GOBHI staff shall be treated with dignity and respect, regardless of their age, gender, race, ethnicity, national origin, religion, sexual orientation, disability, socioeconomic status, or any other basis proscribed by law.

### Conflict of Interest

A conflict of interest occurs when personal interests could interfere with your ability to make a fair, objective decision on behalf of GOBHI. You should avoid relationships and activities that create, or even appear to create, a conflict of interest. If you are unsure whether a conflict of interest exists, you should talk with the person to whom you report or the corporate integrity officer.

### Gifts and Gratuities

Unless authorized in advance, you are expected to always decline graciously when offered tips, gratuities or gifts from salespeople, vendors or suppliers.

GOBHI personnel may not take bribes from or give kickbacks to contractors, subcontractors, consultants, vendors, suppliers or competitors.

## Copyrights and Software Licensing

Use third-party software and related resources only as permitted by software licenses. Do not make or use copies of non-licensed copyrighted material, including written or graphics content, software or photographs.

## Personal Use of GOBHI Resources

The use of GOBHI materials, supplies or equipment is prohibited without prior supervisory approval. You must not remove property from a facility owned or managed by GOBHI without proper authorization. If removed, property must be returned to the facility as soon as it is no longer needed for authorized purposes.

## **Reporting Obligation and Resources**

### Personal Obligation to Report

You are responsible to report activity that appears to violate applicable laws, rules, regulations or this Code of Conduct. If you report a concern but believe that it has not been resolved, contact the corporate integrity officer.

### Resources for Guidance

We encourage you to discuss concerns with the GOBHI chief executive officer. If you are uncomfortable doing so, you can discuss the situation with the corporate integrity officer. You may contact them directly, or call the GOBHI Hotline at 1-844-773-7237.

We cannot guarantee to keep your identity confidential if you report a concern or possible misconduct, but we will maintain confidentiality within the limits of the law and our ability to investigate the issues you have brought to our attention.

GOBHI absolutely prohibits, and will not tolerate, retaliatory discipline against a worker who reports concerns to the home office. Claims of retaliation will be investigated, and appropriate action will be taken.