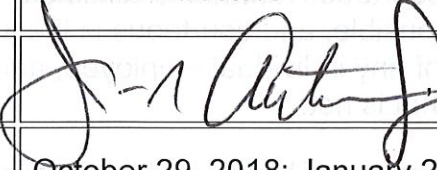


Helio Health, Inc.

Ethical Code of Conduct Policy

Policy Number:	ADM - 02
Name:	Ethical Code of Conduct
Origin:	Board of Directors
Approved:	 Board of Directors
Date(s):	October 29, 2018; January 29, 2018; 5-21-07

1.0 PURPOSE:

The purpose of this policy is to establish ethical principles for all people and programs of Helio Health, Inc. and be dedicated to uphold the highest standards of ethical, professional, and corporate behavior.

2.0 SCOPE:

This policy applies to all people and programs within Helio Health.

3.0 POLICY:

- 3.1** All people and programs of Helio Health will strive to promote honesty, fairness, and responsibility in all forms of marketing and advertising. Helio Health will abide by the highest ethical standards and will avoid making false claims, stereotyping, discrimination, and unverified claims in its marketing.
- 3.2** All people and programs of Helio Health will act in good faith, make required disclosures, and refrain from deception or misleading practices regarding contract management responsibilities. Helio Health will adhere to all state and federal laws and regulations regarding contract management activities.
- 3.3** All people and programs of Helio Health will exercise the utmost good faith in all transactions touching upon their duties at Helio Health and its property. Such persons shall not use their positions or knowledge gained therefrom so that a conflict might arise between the interest of Helio Health and that of the individual director, officer, Key Employee, appointee, employee, volunteer, or any other persons affiliated with Helio Health.

- 3.4** All people and programs of Helio Health will be aware that all social media posting, done on or off the premises, while on or off duty, could have an adverse effect on Helio Health business interests. Helio Health company business cannot be conducted on personal social media accounts and all Federal and State confidentiality laws will be followed.
- 3.5** All people and programs of Helio Health will neither give nor accept gifts of significant value from patients and will follow the Helio Health guidelines for agency fundraising. All gifts and donations, monetary or non-monetary, will be reported to the Development Director for appropriation.
- 3.6** All people and programs of Helio Health are expected to act in a professional, responsible, and courteous manner at all times. The judgement of what is professional, responsible, and courteous is the judgment of the management of Helio Health, not of any individual employee, and is the benchmark for what is acceptable and what is not.
- 3.7** All people and programs of Helio Health will follow all Federal and New York State Health Care Fraud and Abuse Laws and is prohibited from intentional fraud, waste, or abuse of Helio Health appropriated funds and will refrain from making false statements during any reporting or investigation.

4.0 ADDITIONAL REFERENCES:

- 4.1** For additional information regarding ethical conduct, refer to the following Helio Health policies and supporting documentation:
 - 4.1.1** Helio Health Employee Handbook
 - 4.1.2** ADM-06 – Corporate Compliance Plan
 - 4.1.3** ADM-09 – Gift Acceptance and Fundraising Policy
 - 4.1.4** ADM-13 – Conflict of Interest Policy
 - 4.1.5** CLN-10a-c – Incident Documentation, Notification, and Review Policies
 - 4.1.6** CLN-12 – Patient Rights Policy
 - 4.1.7** CLN-13 – Patient Confidentiality and Medical Records Policy
 - 4.1.8** HR-08 – Social Media Policy

