



CODE of CONDUCT

A Letter from Tony Kilgore, CEO

Dear CARDians,

Our mission is to make a difference in the world by providing top-quality, innovative, evidence-based, effective treatment to ensure that individuals fulfill their potential. Essential to delivering this mission is the trust our patients place in us and our commitment to providing exceptional care with the highest standards of ethical conduct.

I believe we all understand what it means to carry out our business and conduct ourselves ethically. Our Corporate Compliance Program is in place to provide guidance to help us live by our values and responsibly serve each other and our patients. It provides the framework to promote compliance, foster respect for individuals, and share information on rules that govern our work.

We are each personally responsible for supporting CARD and the patients we serve by making the commitment to learn and act within the Code's guidance. Honoring this commitment ensures a workplace culture that reflects our core values and our responsibility to uphold ethical principles and compliance.

Please review the information in the Code carefully and ensure you understand it. If you have any questions, please speak to your direct supervisor or a member of the HR team.

As always, thank you for bringing our values to life with the exceptional care you provide each day to our patients and families and the culture of compassion, integrity, and excellence you foster at CARD.

Sincerely,
Tony Kilgore

A. Overview

The Center for Autism and Related Disorders (or “CARD”) is proud of its business conduct and reputation in the health care community and in the specialty of the treatment of autism spectrum disorder. Each employee (provider, management personnel, and support staff – collectively “Employee”) is expected to adhere to the high standards of conduct of CARD whenever s/he acts on behalf of CARD, whether interacting with external providers, patients and their families, vendors, government regulators, or the general public. Violations of applicable laws, rules, regulations, and company policies (“Requirements”) jeopardize the welfare of CARD and its reputation within the health care community.

The Center for Autism and Related Disorders has adopted this Code of Conduct (the “Code”) to reinforce CARD’s corporate values and to serve as a guide for moral, ethical and legal behavior. The Code is intended to define the conduct expected of Employees and to emphasize and enhance a culture that values compliance. The basic principles by which we try to conduct our business are simple.

Every Employee should:

(1) Comply with all applicable laws, rules, regulations, and company policies;

(2) Adhere to the highest moral and ethical standards at all times; and

(3) Report suspected violations of the Code, policies, procedures, law, rules, regulations, and/or company policies.

These principles are at the heart of our Code, which is a central component of our Corporate Compliance Program.

B. Code of Conduct

This Code contains the basic ethical rules and general standards of conduct that apply to all Employees. There may be times, however, when you face a situation that is not specifically covered by the Code. The complex challenges we face in the health care arena are not always easily categorized or addressed, and you may find that you need assistance in addressing a specific issue or concern or clarification related to a compliance question.

When you are faced with a potential compliance issue, concern, or question, the rules are easy: (1) *always do the right thing*; and (2), if you are not sure what the right thing is to do, then *ask for help* by reaching out to the many resources available to assist you:

- You are encouraged to consult with your supervisor or manager for clarification or guidance about what actions to take.
- If you do not feel comfortable approaching your supervisor or manager, you may also contact the Chief Compliance & Privacy Officer, the Director of Compliance and Auditing, the Compliance Department, a member of the Operations Compliance Committee, representatives from Human Resources, or CARD management. CARD has an open-door policy for these people to receive you whenever you have such concerns or require such clarification or guidance. You can actually help CARD by coming forward when a policy or procedure may require further clarification, not just for you but for others, as well.

- If you prefer to report an issue or concern anonymously, you may call the Compliance Hotline at 844-995-0384.

We will make every effort to ensure that questions or concerns brought to the attention of the Chief Compliance & Privacy Officer/Director of Compliance and Auditing or directly or through the Compliance Hotline will be kept confidential and that no adverse action will be taken against you for asking questions or raising good-faith concerns about possible improper conduct or what is required by our Corporate Compliance Program.

Each of us is responsible for following the principles in the Code and for seeking guidance and direction when necessary. Failure to follow these principles could lead to disciplinary actions. Many of the topics described in the Code are broad and complex, and additional, more specific guidance is provided in the Corporate Compliance Program Policies and Procedures, with which you should familiarize yourself.

Your responsibilities under the Code of Conduct include:

1. Know the Code of Conduct

It is your responsibility to read and become familiar with the Code and how it applies to your job responsibilities. You will be required to acknowledge that you have received, read, understand, and will comply with the Code by signing and dating the attached Code of Conduct Statement of Understanding Form, which will be placed in personnel files.

2. Comply with All Legal and Regulatory Requirements

Every Employee must strictly observe all laws and regulatory requirements that apply to CARD. These laws include billing for claims correctly, having proper financial relationships with referral sources, and proper promotion of CARD. The laws that touch upon these actions include the False Claims Act, the Anti-Kickback Statue, and the Physician Self-Referral Laws (commonly referred to as the “Stark Law”). CARD does not pursue or condone any course of action involving a violation of these Requirements. Every Employee is expected to be familiar with and act in accordance with the Requirements and CARD’s Corporate Compliance Program Policies and Procedures, including the Code of Conduct.

Employees can learn the laws and regulations that apply to their work by attending internal or external training programs, consulting managers and supervisors, reviewing CARD policies, and/or asking questions of the Chief Compliance & Privacy Officer or Director of Compliance and Auditing. Employees are expected to use such resources whenever they require assistance in understanding their legal obligations. Attendance at CARD new-hire and annual compliance training is mandatory.

3. Behave Ethically and Professionally

CARD Employees are expected to display and promote the highest standards of professional and ethical conduct when they act on behalf of CARD. At CARD, we act with the competence, skill, and integrity of our professions. We behave with dignity and courtesy towards our patients, coworkers, and others in business-related activities. We are honest, fair, reasonable, and objective in our professional relationships.

CARD expects each Employee to recognize and avoid activities and relationships that involve or might appear to involve conflicts of interest or compromise his/her integrity. Do not be pressured. You are never expected to violate

a law, policy, or ethical standard. You should never be encouraged or pressured to do so, even if the violation would improve financial performance or help meet a financial goal. Always act with integrity and do the right thing.

4. Respect Diversity

We at CARD recognize that our strength lies in the talents of our Employees, and we are committed to providing all Employees with a healthy, safe, and productive work environment. Respect for diversity and the uniqueness of everyone is a fundamental part of the CARD culture and a core component of (a) maintaining a respectful and productive work environment and (b) serving diverse patients in our community.

CARD hires and promotes people based on their qualifications, performance, and abilities. We do not tolerate illegal discrimination against anyone at CARD, including visitors, patients, and fellow Employees. CARD expects all Employees to abide by all Human Resources rules, regulations, policies, and practices related to employment standards. CARD treats illegal discrimination as a form of misconduct, and sanctions will be enforced against individuals determined to be engaging in such behavior.

5. Provide Medically Necessary, Quality Care and Honor Patients' Rights

At CARD, we provide care that is medically necessary and meets regulatory and payer standards. We provide top-quality, evidence-based treatment using the principles and procedures of applied behavior analysis (ABA) across all populations anywhere in the world. At CARD, we ensure optimal outcomes by incorporating the latest treatment research, technology, and training into the CARD Model.

CARD is committed to following all applicable Requirements relating to informed consent, quality of care, patient safety, and patient rights. CARD supports families at every point in the assessment and treatment process. We expect our Employees to uphold professional standards of care, report patient safety concerns, and engage in quality improvement activities.

6. Document, Code, Bill, and Collect Appropriately

CARD claims for payment of services are made with integrity to avoid fraud, waste, and abuse in health care. All Employees are expected to comply with Federal health care program rules including, but not limited to, Medicare/Medicaid rules, Federal and State False Claims Acts, and commercial payer rules.

We bill only for medically necessary services rendered by eligible providers and properly documented and coded. We respond to patient and payer questions concerning charges in an accurate and timely manner. We correct any billing errors of which we have knowledge and refund any payments received in error to third-party payers and patients with appropriate documentation.

If Employees become aware of inaccuracies, Employees are obligated to notify their supervisor, so the error can be corrected. If, after notifying a supervisor, Employees continue to have concerns with claims that have not been or are not actively being corrected, these employees are required to contact the Compliance Department, Compliance Hotline, Chief Compliance & Privacy Officer, or Director of Compliance and Auditing.

7. Maintain Confidentiality and Security of Patient Records

Protecting the confidentiality and security of patient information is a CARD priority. We access confidential patient information and share it with others only when authorized to do so and for the purpose of doing our jobs. We follow

applicable laws and policies when releasing confidential patient information. We investigate and report breaches of patient information and take steps to secure our systems from unauthorized access and to comply with information security policies. Every Employee is expected to maintain the confidentiality of patient records and information to the full extent of the law.

8. Record, Report, and Retain Information Accurately

Honesty is the cornerstone of ethical recording and reporting of information. Every CARD Employee is expected to comply with governmental requirements regarding recordkeeping, as well as CARD Policies and Procedures. CARD maintains and reports accurate records about our patients, employees, clinical procedures, research trials, quality, safety, and finances. It is the responsibility of each of us, when engaged in recordkeeping and/or reporting on behalf of CARD (including employee time records, medical records, and patient bills), to be accurate and honest. For example:

- We do not sign another person's name to documents or share each other's passwords;
- We amend the medical record only in accordance with CARD policy and applicable law;
- We do not fabricate, falsify, or plagiarize when proposing, conducting, or reporting research; and
- Our financial records conform to applicable accounting principles.

CARD retains documents for the length of time in accordance with all applicable federal and state laws and as described in CARD document retention policies. When no longer needed, these documents are destroyed in a manner that protects the confidentiality of personal health information contained in them.

9. Protect Proprietary Information

Proprietary information includes information about CARD finances, business practices, processes, patients, and employees. Trade secrets are information and intellectual property used by CARD that may not be subject to patent, copyright, or trademark secrets but will not be known by competitors and which CARD takes measures to protect. All Employees are responsible for safeguarding from public disclosure CARD's proprietary information and trade secrets.

10. Use Social Media and Technology Responsibly

CARD encourages an online and social media culture that complies with the law, internal policies, procedures, and ethical values. CARD Employees may not disclose confidential or proprietary information about CARD, its patients, or its employees on social media (including, but not limited to, communications over the internet, on personal websites or webpages, or in online communities). We do not take or transmit photographs or recordings of patients, visitors or staff in the workplace, except as permitted by our policies. Any questions concerning the appropriate use of social media and technology should be directed, as applicable, to the Chief Compliance & Privacy Officer/Director of Compliance and Auditing.

11. Maintain a Healthy and Safe Environment

Maintaining a safe and sustainable environment, both inside and outside the workplace, is vital to the health and well-being of us all. CARD strives to provide a safe working environment for our Employees and to meet or exceed the standards of all applicable laws and regulations governing workplace safety, health, and the environment. Employees are required to report safety concerns to their supervisor, manager, or the Compliance Department.

12. Obey Anti-Competitive Rules and Regulations

“Antitrust” laws are intended to promote competition in the marketplace for the benefit of consumers. CARD is committed to antitrust compliance and fair competition. We do not make unlawful agreements with competitors about prices or charges, services that we provide, or from whom to buy. We do not discuss related matters, such as pricing policies, purchasing practices, costs, salaries, marketing plans, or surveys, with those outside of CARD. Any antitrust concerns should be brought to the attention of the Chief Compliance & Privacy Officer and Director of Compliance and Auditing immediately, as violations of these laws can result in criminal, as well as civil, liability.

13. Do Not Engage in Fraud, including Kickbacks and Self-Referrals

The Federal Anti-Kickback Statute prohibits individuals or entities from knowingly and willfully offering, paying, soliciting, or receiving “remuneration” (or kickbacks or bribes) to induce referrals of items or services paid by a federally funded program, such as Medicare, Medicaid, or Tricare. In short, we may not directly or indirectly pay patients or other health care providers to refer patients to us.

Employees may not give anything of value to a patient, vendor, or referral source as an inducement to obtain business or favorable treatment. Likewise, Employees may not accept anything of value, either for themselves or for others, in return for favorable treatment from patients, vendors, or referral sources. All contacts and dealings with patients, vendors, and referral sources must be conducted so as to avoid even the appearance of impropriety.

The Federal Stark Self-Referral Law (Stark Law) prohibits a physician or qualified health care professional (QHCP) from referring patients whose services are paid for by a Federal health care program (Medicare/Medicaid/Tricare) to a health care provider if the physician or QHCP (or an immediate family member of the physician) and provider have a financial relationship. However, referrals are permitted if the financial relationship is structured to comply with certain exceptions to the Stark Law. If the relationship does not comply with an exception, the physician or QHCP cannot refer patients to the provider with whom s/he has a financial relationship, and the provider cannot bill for services provided to those patients.

Both laws are highly complex but include specific exceptions called “safe harbors” for various payment and business practices that are permitted under the laws. Many states have similar laws. Employees must take special care and promptly refer any questions to the Compliance Office.

CARD does not tolerate fraud and is committed to the rigorous investigation of any suspected cases of fraud. Should any Employee believe they have good reason to suspect a colleague or other individual is engaged in fraud or that an offense involved CARD or serious infringement of CARD’s Code of Conduct, s/he should immediately report such unethical action to the Chief Compliance & Privacy Officer and/or Director of Compliance and Auditing.

14. Do Not Do Business with Excluded Individuals or Entities

CARD expects all individuals and entities associated with CARD to be appropriately credentialed, licensed, and otherwise qualified to perform their duties. CARD does not do business with, employ, or bill for services rendered by individuals or entities that are excluded or ineligible to participate in Federal health care programs. CARD Employees and vendors have a responsibility to report to their supervisor, Human Resources, Credentialing, or purchasing (as applicable) if they are excluded, debarred, or otherwise ineligible to participate in Federal health care programs.

15. Do Not Tolerate Workplace Violence or Harassment

CARD Employees show proper respect and consideration to one another, regardless of position. Violence, threats, harassment, intimidation, and other disruptive behavior in our workplace are not tolerated. All reports of incidents will be taken seriously and will be dealt with appropriately. Such behavior can include oral or written statements and/or gestures or expressions that communicate a direct or indirect threat of physical harm.

We will not tolerate sexual advances or comments or other conduct that create an intimidating or offensive environment, nor will we tolerate racial or religious slurs or other remarks or jokes or conduct that encourages an offensive working climate. Individuals who commit such acts may be removed from the premises and may be subject to disciplinary action, criminal penalties, or both.

16. Comply with all Marketing Rules and Regulations

CARD conducts its marketing activities in an honest, trustworthy, and ethical manner. All marketing will be presented in a fair manner and will not be deceptive, misleading, or likely to be misleading. When providing information about our services, we shall communicate clearly and accurately. We shall take necessary measures to ensure that all marketing activities conform to the requirements of applicable Federal and State law.

17. Follow Rules Regarding Political Activity

While the right to free speech is at the core of our political system, the right to make political contributions and lobby government officials is heavily regulated by federal and state laws. Both CARD and you as an employee are subject to complex rules, including rules specifying the amount of, and way in which, contributions made by made. It is important to keep separate personal political activities from CARD activities. The rules regarding political activity can be summarized as follows:

- We recognize your right to vote and be politically active on your own behalf;
- Only our designated representatives may speak on CARD's behalf about politics and related matters;
- Never use CARD funds or resources for political activities, even if those funds are reimbursed; and
- You should never feel pressured to make a political contribution or to vote in a certain way by anyone working for us or on our behalf.

18. Disclose and Appropriately Manage Conflicts of Interest

A conflict of interest is a situation in which you have a personal or private interest that interferes with (or appears to interfere with) your ability to do your job fairly and ethically. Our policy regarding conflicts of interest is simple: ***Do not compete with our organization, and never let business dealings on behalf of the organization be influenced (or appear to be influenced) by personal or family interests.***

Conflict-of-interest issues typically arise in these settings:

- Receiving gifts or favors from a vendor or referral source;
- Participating in activities that compete with the organization;
- Allowing family or personal relationships to influence your business judgment; and
- Giving or offering gifts or favors to government employees.

We believe that Employees owe a duty of loyalty to CARD. Therefore all Employees should avoid any actual or apparent conflicts of interest. CARD management and officers must disclose any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest. Employees must not use their official positions to influence a business decision in which they know, or have reason to know, that they have a financial interest. Accepting or giving a gift can appear to be an attempt to improperly influence the recipient. By exercising reasonable judgment and common sense with respect to gifts, you will avoid situations that might bring your integrity into question.

19. Respond Appropriately to Government Inquiries

Various external organizations may contact individuals associated with CARD with requests for information or to initiate a compliance-related inquiry. CARD will comply with lawful and reasonable requests or demands made as part of a government investigation or audit in a cooperative and truthful manner. At the same time, it is imperative that we protect the rights of CARD and its Employees. Both CARD and its Employees have the right to be represented by legal counsel during any government inquiry, including the right to have an attorney present during questioning, whether that questioning occurs at work or away from work. Consulting with an attorney does not mean the individual is unwilling to cooperate.

If you receive an inquiry, visit, subpoena, or other legal document from a representative from any government agency, at home or at work, regarding CARD business, or if you are otherwise contacted by a third party in connection with a government investigation, or if you learn of a government investigation that may relate to CARD, immediately notify your supervisor or manager **and** the Chief Compliance & Privacy Officer/Director of Compliance and Auditing.

20. Report Compliance Concerns Without Fear of Retaliation

As an Employee, if you observe or have information about events or behaviors that you believe are unethical, illegal, against policy, or against prescribed protocol, it is your duty and obligation to report such concerns. Every Employee **must** report any possible violations of law or ethical standards in accordance with procedures identified in the Corporate Compliance Program. Specifically, you must report known or suspected compliance issues, either to the anonymous Compliance Hotline at 844-995-0384 or directly to the Chief Compliance & Privacy Officer/Director of Compliance and Auditing.

These resources have been put in place to help us meet our compliance obligations. As such, do not hesitate to ask for assistance, and such assistance should be forthcoming. CARD will not tolerate any intimidating or retaliatory act against an individual who, in good faith, makes a report of practices that s/he believes could be in violation of the Code, Corporate Compliance Program, or applicable Requirements.

C. Summary of Compliance Principles

All Employees must abide by the letter and spirit of all applicable laws and regulations. Employees must adhere to the highest ethical standards of conduct in all business activities and must act in a manner that enhances CARD's standing within the health care community. To this end, CARD will promote relationships based on mutual trust and respect and provide an environment in which individuals may question a practice without fear of adverse consequences.

The appointment and retention of Employees is contingent upon acceptance of and compliance with the Code. It is expected that outside colleagues (e.g. vendors, consultants, and others whose actions could be attributed to CARD) will adhere to similar standards in their dealings with us and with others on our behalf. This Code and the Corporate Compliance Program are intended to establish a framework for legal and ethical conduct by CARD, particularly



compliance with Federal and State laws on fraud and abuse and confidentiality. It is intended to reflect collective good judgment and common sense. It is not intended to replace other compliance practices or rules and regulations as defined in other corporate policies and procedures, including Corporate Compliance Policies and Procedures.

Employees are encouraged to contact the compliance team whenever they need clarification or direction regarding compliance issues, including questions regarding the Code. Employees are **required** to report suspected violations of the Code, policies, procedures, law, and regulations to a supervisor, manager, the Compliance department, a member of the CARD management team, or the confidential Compliance Hotline. Retaliation is not permitted against anyone who seeks advice, raises a concern, or reports misconduct in good faith. Any form of retaliation should be reported immediately to the Chief Compliance & Privacy Officer/Director of Compliance and Auditing, as such retaliation would be contrary to CARD Requirements.

Providing health care to our patients and our community is an enormous responsibility. If each of us abides by this Code of Conduct, we will do our part to support and promote CARD's reputation for integrity and honesty in the community and help ensure that CARD is compliant with applicable Requirements.

Statement of Understanding
Center for Autism and Related Disorders, LLC
Code of Conduct

By signing below:

1. I acknowledge that I received and read the CARD Code of Conduct (“Code”) dated 10-9-20 and that I understand its contents.
2. I understand and agree that I must comply with the Code, Corporate Compliance Program Policies and Procedures, and all laws, regulations, rules, policies, procedures, and other guidance applicable to the responsibilities of my position.
3. I agree to fully cooperate with the implementation of the Code and Corporate Compliance Program.
4. I agree to fully participate in any auditing or monitoring processes and to report any instances of possible violation of laws, regulations, or policies that are applicable to CARD.
5. I acknowledge that CARD maintains a Compliance Hotline (844-995-0384) for the purpose of receiving notifications of possible violations of laws, regulations, the Code, and Corporate Compliance Program Policies and Procedures.
6. I understand that my failure to report any concerns regarding possible violations of laws, regulations, the Code, or Corporate Compliance Program Policies and Procedures may result in disciplinary action, up to and including termination of my employment or contractual relationship with CARD.
7. I certify that I have not been excluded from participation in any Federal or State health care program and have not been convicted of a health care related offense.
8. I understand that this executed Statement of Understanding will be maintained as a permanent part of my personnel file in the Human Resources Department and that any breach of this Code will result in prompt remedial action up to and including termination and possible legal action as reflected by the nature and severity of the offense.
9. I confirm that I have fully disclosed and will disclose in the future any of the following:
 - a. Any criminal suspicion, charges, or convictions of a crime or offense involving abuse, violence, sexual misconduct, or any misconduct involving minors or juveniles.
 - b. Any investigation or court order involving domestic violence, child abuse, or similar matter.

Signature

Date

Print Name

Title