



## CODES OF CONDUCT

### **Ethical Code of Conduct**

The successful business operation and reputation of Breakthrough Behavior is built upon the principles of fair dealing and ethical conduct of our Board of Directors, Executive Leadership Team and its employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations. We place a very high priority in conducting our business in compliance with the law and in accordance with the highest standards of business and personal ethics.

The continued success of Breakthrough Behavior is dependent upon our client's trust and we are dedicated to preserving that trust. Employees owe a duty to Breakthrough Behavior, our clients, and stakeholders to act in a way that will merit the continued trust and confidence of the public.

Breakthrough Behavior clinicians have a heightened level of responsibility to practice in the field of Behavior Analysis and must adhere to the BACB Professional & Ethical Compliance Code. A copy of the BACB code can be found at [www.bacb.com](http://www.bacb.com).

No action may be taken or threatened against any employee for asking questions, voicing concerns, or making complaints or suggestions in conformity with the ethical code of conduct, unless the employee acts with willful disregard of the truth. Failure to behave honestly, and failure to comply with law, and the Company's policies, may result in disciplinary action, up to and including termination.

### **Business Code of Conduct**

Breakthrough Behavior requires that all Board of Directors, Executive Leadership Team, and employees abide by the fundamental principles of ethical behavior listed below in performing their duties:

**Obeying the Law**- Comply with all applicable laws and regulations by conducting business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

**Respecting Human Rights** - We respect human rights and operate in full compliance with all laws and regulations prohibiting such.

**Providing Quality Services**- We are committed to providing quality services. Our business records and communications involving our services are truthful and accurate.

**Competing Ethically** - We gain competitive advantage through superior services and business practices. We do not engage in unethical or illegal business practices.

**Avoiding Conflicts of Interest** - We avoid relationships or conduct that might compromise judgment or create actual or apparent conflicts between our personal interests and our



loyalty to Breakthrough Behavior. We do not use our position with Breakthrough Behavior to obtain improper benefits for ourselves or others. Please see the policy on Ethical Code of Conduct.

**Confidential Information** – It is the policy of the Company that its Board of Directors, Executive Leadership Team, and employees are expected to protect the assets of the Company and use them efficiently to advance the interests of the Company. Those assets include tangible assets and intangible assets, such as confidential information of the Company. No employee at any time during, or subsequent employment, or other service to the Company, without proper authority or mandate, should use or disclose confidential information obtained from any source in the course of the Company's business. Examples of confidential information include non-public information about the Company's plans, earnings, financial forecasts, business forecasts, discoveries, technologies, and personnel.

**Adherence to BACB Professional and Ethical Compliance Code and the RBT Ethics Code**  
A code of ethics and professional conduct outlines the ethical principles that govern decisions and behavior at a company or organization. They give general outlines of how employees should behave, as well as specific guidance for handling issues like harassment, safety, and conflicts of interest.

Each BCBA is subject to ethical requirements which govern his/her conduct as well as the conduct of those persons who work under the supervision of that BCBA. Therefore, each employee of Breakthrough Behavior who provides services must be familiar with and conform to the ethical requirements imposed on the BCBA. All Clinicians have a duty to strictly adhere to the Code(s).

If you feel as though the conduct of any Breakthrough Behavior RBT, BCBA, BCaBA or BCBA-D does not uphold BACB standards, you have the right to file a complaint at [www.bacb.com](http://www.bacb.com).

For more information, please refer to the Professional and Ethical Compliance Code for Behavior Analysts or the RBT Ethics Code which can be found in the Company's payroll system.

**Offering/Accepting Gifts, Entertainment, Bribes or Kickbacks, Solicitation** – Breakthrough Behavior's policy on giving and receiving hospitality and gifts is designed to ensure that personnel are not, and are not perceived to be, engaging in unethical business practice. Personnel are prohibited from giving gifts, or accepting them from, a third party if they might be perceived as materially influencing a relationship to obtain unfair advantage. We do not offer or accept gifts or entertainment of substantial value (\$5 is the limit). All Employees are required to declare any hospitality and gifts provided to them to the Human Resources Department.

The Company requires all employees to only use lawful practices involving payments to customers, political parties, officials, candidates or governmental authorities. As a result, kickbacks and bribes offered with the intent of inducing or rewarding specific buying decisions or actions are strictly prohibited.



The Company will not make any contributions to any political party or candidate for political office in violation of federal or state law.

If an employee learns that a coworker is engaging in conduct contrary to this policy, the employee must report this information immediately to Human Resources.

Understanding that employees may occasionally wish to communicate with their co-workers to advertise personal items for sale or to participate in fundraisers for non-profit organizations, children's schools and other non-work events, we allow use of lunch rooms and electronic bulletin boards to distribute such information. Management reserves the right to monitor such communications and remove them if inappropriate or not in the best interest of operations.

In respect for other's efficiency, please do not use work email, voicemail or other resources as a means to solicit or distribute non-work materials. Activities that disrupt work hours or operations are prohibited. Persons not employed by may not solicit Company employees for any purpose on Company premises.

**Reporting Ethical, Legal or Financial Integrity Concerns** - Any person may openly or anonymously report any ethical concern or any potential or actual legal or financial violation, including any fraud, accounting, auditing, tax or record-keeping matter, to Breakthrough Behavior's Chief Executive Officer. For reports that are not made anonymously, confidentiality will be maintained to the extent possible while permitting an appropriate investigation to be conducted. If you feel that the behavior of Breakthrough Behavior does not uphold the standards of accreditation, formal complaints can be made to the Behavior Health Center of Excellence at [www.bhcoe.org](http://www.bhcoe.org).

**Personal Responsibility** – Every Board of Director, Executive Team Leadership member, Clinician and Administrator has the personal responsibility to read, know and comply with the principles contained in this Code of Business Conduct. Compliance with these principles is a condition of employment, and failure to comply will result in discipline up to and including termination. Should you suspect a potential violation, please go to [www.bacb.com/ethics](http://www.bacb.com/ethics) in order to fill out the applicable violation form.

All fraud, waste and abuse concerns should be reported to our internal hotline, and/or the OIG Hotline Number: 1-877-499-7295. For more detailed information, please go to <https://www.opm.gov/our-inspector-general/hotline-to-report-fraud-waste-or-abuse/>.