



Guiding PRINCIPLES

SERVE: *Give excellent care and personal attention to your clients.* Document that care well. Live up to your professional responsibilities. Summit's policies, resource guides, and training will guide you to do the right thing, but not every situation is covered, so use good judgement and do your best.

UNDERSTAND: *Treat everyone fairly - coworkers, clients, visitors, applicants, and business partners.* Never discriminate against, harass, or mistreat anyone based on race, color, religion, sex, gender, sexual orientation, gender identity, national origin, age, disability, ancestry, genetic information, marital status, veteran status, or anything else.

MAKE: *Make the treatment environment nurturing, keeping it safe and clean.* Do not tolerate violence, abuse, or neglect. Do not insert yourself into a client's personal affairs. Protect client privacy, dignity, and boundaries, even on social media. Communicate clearly and honestly with clients and payors, and charge them only for care actually provided.

MODEL: *Follow the laws and rules that govern how we provide care and do business. Never give, take, ask for, or promise money or anything of value to induce a referral to one of Summit's facilities.* Cooperate honestly and reasonably with law enforcement and licensing and accrediting bodies, and let your facility leadership or Summit's Legal Department know if anyone from these entities contacts you. Protect Summit's property, money, information, and business opportunities; do not take or use them for yourself or others. Do not solicit political contributions from your coworkers.

INSURE: *Be honest in business and advertising.* Never make a false record or report. Never keep accounts "off the books" or make or take a payment "under the table." Never give or take money or expensive gifts to steer business to or away from Summit. Never share or steal secret information or agree to fix prices or divvy up a market. Never take, pay, or promise a bribe. Report to us any worker diverting medicine or under the influence of drugs or alcohol, not properly licensed, or excluded by a government healthcare program.

TELL: If you see a violation or suspect a legal or ethical concern, report it. We will not retaliate against you for your good faith concern or complaint. We will investigate and counsel, coach, discipline or terminate the violator as appropriate.

Reporting Options:

- Contact your supervisor, Human Resources, or the Chief Compliance officer;
- Raise the concern online at summitbhc.ethicspoint.com;
- Email corporatecompliance@summitbhc; or
- Call the Compliance Hotline at 844-920-1197.