

Integrity Begins With You:

Our Code of Conduct at
CenterLight Healthcare



Thank you for making a commitment to following our code of conduct.

Dear Staff:

At CenterLight Healthcare, we strive to provide the highest quality of care possible. our Core Values – Integrity, Caring, Diversity, Creativity, Approachability, Availability, and Accountability – guide our work as we carry out this mission.

It's no accident that Integrity comes first. To me, it means always doing the right thing, even when no one else is watching. It's the foundation required for CenterLight Healthcare to operate effectively. Working with Integrity keeps us in compliance with government regulations. But just as important, it safeguards our organization, our workforce and our mission.

Remember: CenterLight Healthcare's Integrity begins with you. This Code of Conduct provides useful information and important guidelines for all of us. Please read through the Code and make a commitment to following it.

Thank you for your hard work and dedication to our participants and their families.

Sincerely,

Alicia Nelson-Jones
Chief Compliance Officer

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Why a Code of Conduct?

**As a healthcare non-profit,
we must operate within appropriate government
regulations, laws and guidelines.**



To that end, and to safeguard our mission and our organization, we've established a Code of Conduct that all workforce members must follow.

We define our workforce as:

- Employees
- Contractors
- Temporary Personnel
- Corporate Officers
- Board Members
- Employed Health Care Providers and Practitioners
- Fee For Service/Per Diem Personnel
- Administrative and Management Personnel
- First Tier, Downstream and Related Entities
- Designated Contractors
- Vendors
- Volunteers
- Agents

WHAT'S A WORK ENVIRONMENT?

The work environment includes all work-related events and activities, whether or not they are held on CenterLight Healthcare property.

FOLLOWING THE CODE OF CONDUCT

When we disregard the guidance outlined in the Code, we place our participants, colleagues and organization at risk. This may result in disciplinary action, including termination and regulatory action against CenterLight Healthcare and individuals.

Good sense and judgment are also needed, so please raise any questions about the Code, policies or practices with your supervisor, the Compliance Team or Human Resources.

LIVING OUR VALUES

Improving the quality of life for our participants forms the basis of everything we do. Regardless of your role at CenterLight Healthcare, our 7 Core Values guide us all in achieving this goal:

- **Integrity:** We do the right thing for patients, colleagues and partners. We must all safeguard CenterLight Healthcare's reputation for ethical conduct.
- **Creativity:** We continually seek new and better ways to carry out our mission. We dedicate ourselves to quality through constant learning and improvement.
- **Diversity:** We embrace the individual preferences and expectations of patients, colleagues and partners. Cultural sensitivity and awareness are essential parts of the health care we provide.
- **Caring:** Above all, we treat our patients, our partners, and one another with respect, compassion and kindness. Everything we do is focused on achieving one goal: improving our participants' quality of life.

- **Availability:** We always pick up the phone and return calls, and emails timely.
- **Approachability:** We will be the premier community resource for our participants and providers.
- **Accountability:** If we make a mistake, we own it, correct it and do not make it again.

AN ENVIRONMENT OF RESPECT

As a member of the CenterLight Healthcare workforce, you're expected to be courteous, professional and respectful in all interactions with colleagues, supervisors, and participants. We treat everyone fairly and without discrimination, regardless of:

- Race
- Color
- Gender
- Sex
- Age
- Ancestry
- National origin
- Alienage
- Creed
- Religion
- Sexual orientation
- Disability
- Pregnancy
- Citizenship status
- Legal off-duty conduct
- Gender identity and expression
- Marital, partnership, familial status
- Military or veteran status
- Arrest or conviction record
- Status as victim of domestic violence, sex offense or stalking
- Genetic disorder, predisposition or carrier status
- Any protected characteristics

CenterLight Healthcare maintains an environment free of slurs, epithets, derogatory comments, threats, unwelcome jokes, teasing, sexual advances, and other unwelcome verbal (e.g. telephone), written (e.g. email) or physical conduct (e.g. posters/music).

THE **C**ODE IN ACTION

Q: Claudia is a new employee. Born in Jamaica, her family relocated to the United States when she was a child. Her colleague John likes to use a pretend Jamaican accent when speaking with her, to make her feel “welcome.” Claudia feels uncomfortable but is not sure how to handle it. What should she do?

A: Making someone feel uncomfortable about their heritage – whether it’s deliberate or not – is unacceptable. Claudia should first try telling him calmly but directly that his comments make her uncomfortable. If he still continues, she should report the situation to her supervisor and to the human resources department.



Our Commitment to Our Community

We strive to provide high-quality, compassionate care, based on these principles:

- We do not discriminate against participants based on the characteristics identified on page 3; their source of payment; or their ability to pay.
- We value and respect the dignity and privacy of those we serve.
- Families and caregivers should always be treated with consideration, courtesy and professionalism.
- We provide reasonable accommodations and modifications for those with disabilities.

It's extremely important that we follow clinical and safety standards at all times. Therefore, we:

- Require our participants to be properly evaluated and treated by qualified, licensed practitioners.
- Ensure that the providers in our network are qualified and appropriately licensed and credentialed.
- Keep complete and accurate records for those we serve, in order to remain in regulatory compliance. This also helps ensure that we have all the information needed to provide appropriate care.

DID YOU KNOW?



We're committed

to continuously evaluating and improving the services we provide. If you have ideas on how we can do things better, please talk with your supervisor.

Government Health Insurance Program Requirements



CenterLight Healthcare operates Programs of All-Inclusive Care for the Elderly (known as PACE) that provide coverage and services to government program beneficiaries, according to contracts with government agencies.

We've adopted policies to ensure our compliance with applicable legal, regulatory and contractual requirements:

ACCESS TO CARE. We must ensure timely, appropriate and geographically convenient access to care, including preventive services.

COSTS & BILLING. All accounting, reporting, billing and financial activities must be accurate. Overpayments received from government agencies must be promptly returned. Costs cannot be improperly shifted to participants or the government.

ELIGIBILITY. Enrollment applications must be processed according to program rules. Helping ineligible persons receive government benefits, including enrollment into a government healthcare program is prohibited.

EXCLUSION SCREENING. We do not employ, contract with or reimburse any party to provide items/services that are excluded from participation in federal or NY State healthcare programs. All parties associated with CenterLight Healthcare are screened prior to work and on a monthly basis. We monitor activities to ensure we follow all regulatory requirements.

Fraud. All suspected or actual fraud and abuse must be reported promptly to a supervisor or the Compliance Team. The Chief Compliance Officer coordinates disclosure to a government agency or law enforcement official when appropriate.



We must ensure timely, appropriate and geographically convenient access to care.

MARKETING & SALES.

All marketing, sales and business development activities must be conducted in accordance with Centers for Medicare & Medicaid Services (CMS) and/or New York State Department of Health (DOH) guidelines.

CMS and/or DOH must approve all materials and events prior to use. We must provide accurate and easily understood material to members or potential members. We must promote programs to everyone and may not “cherry pick” healthier individuals for enrollment.

PROVISION OF SERVICES.

Coverage must be provided for all medically necessary services in accordance with our benefit plan. Clinical decisions about medical benefits must be made by licensed clinicians, subject to applicable law.

REPORTS. All reports submitted to government entities must be complete, correct and in accordance with applicable guidelines and timeframes.



Clinical decisions about medical benefits must be made by licensed clinicians, subject to applicable by law.

Our Compliance Program

WHAT IT IS

Our Compliance Program is designed to help us all better understand and follow the standards we value most as an organization. As members of our workforce, you're expected to be honest, ethical and fair in your work, and to follow all legal and regulatory requirements. Unlawful or unethical behavior will not be permitted.

WHO OVERSEES IT

Compliance leadership, including our Chief Compliance Officer, the Compliance and Quality Committee of our Board of Directors and the CenterLight Healthcare Corporate Compliance Committee oversee the program.

WHAT IT DOES

CenterLight Healthcare's Compliance Program enables us to operate according to the highest ethical, legal and business standards, by offering our workforce:

Guidelines

related to their work, or as a representative of CenterLight.

Instructions

on how to carry out your work in an ethical, fair and legal manner.

Explanations

of our values and expectations.

Information

on how to ask questions, get information and report concerns.

YOU PLAY A KEY ROLE

We're a dynamic organization of more than 800 employees. We all play an important role in upholding our ethical standards. Therefore, it's important to avoid:

1. Actions that violate laws/regulations.

This means that you must be familiar with – and follow – the legal and regulatory requirements for your job.

2. Fraudulent or deceptive activity.

This includes misrepresenting CenterLight, deliberate omission of information or deception in your work activities.



You play a key role in upholding our ethical standards.

3. Use of information, software, systems or any materials without valid permission, authorization or license.

4. Participation in unfair competitive and commercial practices. For example, marketing and advertising practices or arrangements with competitors or others designed to set or control rates, prices, or marketing practices.

5. Use of CenterLight Healthcare property, systems, equipment, money or resources for any matters not related to our business.

Please ask your supervisor or the Compliance Team if you have questions related to any of these activities. CenterLight

Healthcare Leaders are required to create a safe environment that encourages questions and dialogue.

COMPLIANCE REPORTING

All CenterLight Healthcare employees are expected to report known or suspected violations of the Code of Conduct or company policies. The Compliance Team responds to questions and reports, investigates and resolves the concern.

We maintain the confidentiality of the information and the reporter as much as possible. Intimidation and retaliation against anyone who reports or participates in an investigation will not be tolerated.

You may reach out by:

- Calling the Compliance Hotline at **1-855-231-0616**
- Visiting **www.CenterLight.alertline.com**
- Contacting a member of the Compliance Team

RICH LEARNING RESOURCES

CenterLight Healthcare is committed to the ongoing education of its workforce, and offers a wide variety of training related to our Code of Conduct, the Health Insurance Portability and

Accountability Act (HIPAA), fraud, waste and abuse and other compliance topics. Mandatory training is provided at New Hire Orientation, annual in-services and as required.

Educational resources are available 24/7 on CenterLight Healthcare's online learning system or can be through the Compliance Team.

DID YOU KNOW?



The **Compliance Hotline** protects your privacy by letting you report anonymously. An outside organization receives the calls and forwards the details for investigation.

Our Responsibilities

Ethical Business Conduct

We strive to do business in an ethical and responsible way.

The government and tax-payers, as well as our participants and colleagues have placed their trust in us to be responsible stewards of public funds and to deliver high-quality, compassionate health care.

As CenterLight Healthcare's workforce, we hold ourselves to high ethical standards. These standards drive:

- **HIGH-QUALITY CARE** to our participants.
- **RESPONSIBLE PARTNERSHIPS** and support for the communities we serve.
- **A PROFESSIONAL** and **ETHICAL** work environment.
- **A HIGH LEVEL OF PROFESSIONAL CONDUCT** that avoids even the appearance of unlawful or unethical behavior.



At CenterLight Healthcare, we uphold the highest ethical and business standards. These include:

- Complying with the Code of Conduct and the Compliance Program.
- Reporting any action(s) or circumstances that you think might be unlawful, illegal, dishonest, unethical, inappropriate or in violation of The Code or any CenterLight Healthcare policy or procedure.
- Cooperating fully and truthfully with any compliance inquiries.
- Working to correct any improper circumstances that are identified.



REMEMBER

See Something? Say Something!

Never be afraid to ask questions if you become aware of an unethical situation or issue. Contact your supervisor or a Compliance Team member. Asking questions doesn't mean you did something wrong; it means you're doing something right!

BILLING AND PROVISION OF SERVICES

Billing and reimbursement practices and documentation must be complete, accurate and comply with all applicable laws, regulations and CenterLight Healthcare's own policies. We only bill for items and services that are:

- Medically necessary;
- Ordered appropriately;
- Within applicable standards of care; and
- Provided and documented.

You may be subject to discipline up to and including termination and possible criminal prosecution if you:

- Provide false information;
- Intentionally omit information;
- Provide deliberate or reckless misstatements; or
- Misrepresent charges or services.

ENROLLMENT

Prior to enrollment or admission, we ensure that our participants meet all eligibility requirements which must be documented appropriately. We regularly assess these individuals to ensure they continue to meet requirements.

We report any incorrect or unnecessary payment from a government or private payor, in line with applicable laws and regulations.

THE C CODE IN ACTION

Q: Joe, a Billing Specialist, is having a tough time with a doctor who frequently leaves out the specific diagnosis codes required for all Medicare claims. He's worried that the doctor is becoming irritated by his frequent follow up questions. A colleague suggested that he select a general diagnosis code that matches the procedure instead of "bothering the doctor." What should he do?

A: Not requesting clarification and listing a general diagnosis code, rather than the specific diagnosis codes, may result in false claims. Only a doctor can provide diagnoses for billing. Billing staff should always contact the doctor for further documentation or clarification if necessary. If Joe has concerns, he should speak with his supervisor.

PARTICIPATION IN CIVIC ACTIVITIES

CenterLight Healthcare supports local communities through contributions to charitable organizations, sponsorship of health-related programs, and engagement in efforts to expand health insurance options for low-income individuals.

We encourage your participation in civic and political activities. However, workforce members may not:

- Participate in civic or political activities during business hours.
- Solicit participants or their caregivers, family or friends, workforce members and vendors for contributions.
- Use our offices, equipment or resources to carry out civic or political activities.
- State or imply that CenterLight Healthcare is endorsing or associated with your activity.



In addition, please note that our policy, as well as Federal law, prohibit CenterLight Healthcare from reimbursing anyone for personal political contributions.

As a workforce member, you may not hold an elected or appointed government office that:

- Requires activities during normal business hours.
- Requires more than 20 hours per week.
- Presents an actual or potential conflict of interest to CenterLight Healthcare.
- Presents the appearance of a conflict of interest, unless pre-approved by the Chief Compliance Officer.

CONFLICT OF INTEREST (COI)

As a member of CenterLight Healthcare's workforce, you're expected to put the organization's interests before your own personal, business or commercial interests. It's best to prevent actual or potential conflicts by avoiding circumstances that might lead to them. Any business decision you make should be based only on what's best for the organization and those we serve.

Conflicts of Interest can take many forms. Examples include:

- Borrowing money from a participant
- A personal care worker cares for a participant and accepts additional private pay work from the participant's family on the side.
- An administrator hires a company owned by their spouse to cater a holiday party.

**DID YOU
KNOW?**



No interaction

between a workforce member and any vendor, participant, client, contractor, provider, competitor or others should ever be influenced, or appear to be influenced, by personal interests.



- A supervisor hires a relative for a job that is going to report to him or her.
- A transportation coordinator assigns member rides to a particular transportation vendor because the vendor buys him lunch.
- An employee “moonlights” for a competitor.

Please report anything immediately that might create, or appear to create, a conflict of interest to the Compliance Team before taking any action.

**THE CODE
IN ACTION**

Q: You work with a nurse who's having a tough time financially. She was contacted by a durable medical equipment (DME) company for part-time marketing work. The job involves identifying patients who need oxygen equipment and supplies. She asks whether you think it's a good idea. What advise would you give her?

A: The DME company appears to be offering the nurse the position because she can provide patient information. This represents not only a Conflict of Interest, but a HIPAA violation as well.

Operating with Integrity



FALSE CLAIMS ACT

The False Claims Act makes it illegal to knowingly submit or assist in the submission of a false or fraudulent claim for payment to the federal or state government. “Knowingly” means acting with actual knowledge or with deliberate ignorance or disregard of the facts.

We submit claims, data and reports that are used for payment purposes to the federal and New York state governments under several of our programs. To remain in compliance, all of our employees must ensure that these submissions are complete and accurate. If you have a claim-related concern or a question, please report it the Compliance Team right away.

DOCUMENTATION AND RECORDS

Laws, regulations and best care practices require that all records be accurate, truthful, complete and easy to read. We must prepare, maintain and submit all member, patient, resident and business records in an accurate and reliable manner.

These may include, among others:

- Reimbursement claims
- Invoices
- Billing
- Employment-related records
- Participant records

All reports submitted to government agencies, insurance carriers or others must be prepared truthfully, timely, accurately and in compliance with all relevant laws, rules, regulations and contractual requirements.

Likewise, all our records must be maintained in compliance with federal and state regulations.

- All medical and billing records are retained for ten (10) years from the date of service or the date of payment, whichever is applicable.
- All business records (including email) must be retained according to a schedule that follows related laws and regulations.
- We're all expected to follow schedules outlined in the Record Retention Policy.

DID YOU KNOW?



Anyone who reports a concern

is protected by our policy against retaliation and intimidation, and the Whistleblower Protections that are part of the False Claims Act.

If a government audit, investigation, or litigation is expected or underway, records (including email) must be retained until the standard retention requirement has been met or the audit, investigation or litigation has been completed, whichever is later. Please consult with our Compliance Team before moving or destroying any records.



CONFIDENTIAL INFORMATION

We all must keep participant and enrollee (aka, “individual”) information confidential. This applies whether their status is current, former, potential or not enrolled. We must follow CenterLight policies and federal and state privacy and security

regulations, including the Health Insurance Portability and Accountability Act (HIPAA). This includes being careful and respectful when discussing individuals with colleagues.

Individuals’ information may only be shared in two cases:

- 1) if the individual gives permission, and
- 2) if it’s allowable by law.

Examples of confidential information related to our business or individuals include:

- Forms, sales and marketing plans
- Financial information fee or pricing information
- Computer software programs
- Business contact information
- Employee or workforce member information
- Member, patient or resident information
- Trade secrets or other confidential matters

We consider this information confidential and we expect you to treat it that way.

DOCUMENT DESTRUCTION

When it's no longer needed, the information must be destroyed in a way that avoids the risk of the information being seen or used inappropriately, such as use of the shredding bins. For assistance with destruction of electronic information, please contact the IT Security Department at **informationsecurity@centerlight.org**.

When you need to share confidential information for CenterLight Healthcare business purposes, please protect the information, by:

- Including only what is necessary
- Using encryption when emailing outside of the CenterLight Healthcare network; and
- Being cautious using “reply all” and auto-population of email addresses.

THE **C**ODE IN ACTION

Q: Jack is reviewing several documents that contain PHI for a project due the next day. It's late and his colleagues have already left for the day. Only the afterhours housekeeping staff remains. He leaves the reports on his desk so he can finish first thing in the morning. Is this compliant?

A: No. Jack should ensure that unauthorized individuals cannot see or access PHI of any kind. This includes “incidental” disclosures like leaving paperwork unattended on our desk. PHI should be locked up at the end of the day.

REMEMBER: Confidential CenterLight Healthcare information may never be used for personal gain or to assist a third party. Likewise, you are expected to protect the confidentiality of information from third parties who have disclosed information to us.

PROPERTY, FACILITIES AND SECURITY

CenterLight Healthcare's property and resources are available for authorized business purposes only. Illegal or inappropriate use or damage of our property, equipment or facilities is prohibited.

EQUIPMENT

- All equipment, furniture, electronic systems and other material or resources provided to the workforce is the property of CenterLight Healthcare.
- We can only use CenterLight property for appropriate business purposes and within regulatory compliance.
- We do everything reasonable to safeguard and protect this property from loss, damage, misuse or theft.
- All property must be returned upon request.



THE C CODE IN ACTION

Q: As an IT manager, Bob travels across the system and visits facilities on a regular basis. Since everyone knows him as “The IT Guy,” he often does not wear his ID. Is this ok?

A: No. All staff are required to wear their work ID at all times, regardless of whether they are well-known by other staff. It also helps participants identify you as a member of CenterLight Healthcare staff.

SECURITY MEASURES

- Your ID card is an important security tool and you are required to wear it at all times while on CenterLight Healthcare premises.
- Never share it with others or use it to let unauthorized people into our facilities or offices.
- Access to CenterLight's computer systems and electronic information must be protected. Never share your user ID and passwords with others or enter it to allow others to access the information.



Access to CenterLight's computer systems and electronic information must be protected.

REFERRALS, BRIBES AND KICKBACKS

Government regulations and CenterLight Healthcare's policies regarding referrals, bribes and kickbacks include:

- All admission or referral decisions are based on whether the individual meets the program eligibility criteria.
- Federal and State Anti-Kickback Statutes make it a crime to knowingly or willfully offer, pay, solicit or receive anything of value to induce or reward referrals that may be paid for by Medicare, Medicaid, or any other federal or state health care program. This includes to or from physicians, discharge planners, providers, vendors, suppliers, or others.
- Items or services may not be offered for free or below market value to induce referrals. You may not provide payment or other compensation to referrers for services not rendered or payment in excess of fair market value for services that are provided.

- You are prohibited from offering, paying or receiving any gifts, payments or other benefits from any person or entity that we do business with where the purpose is, or may appear to be, to induce or reward referrals of health care services or goods, or other business.

REMEMBER

Visit the Compliance Section of the Intranet

to learn more about federal and state laws regarding bribes, kickbacks and fraud, and protections for reporting suspicious activities.



Violating Federal and State Anti-Kickback Statutes is a felony and is punishable by up to five years imprisonment. The government may also impose civil penalties and

exclude liable individuals or entities from participating in federal and state health care programs.

PROCUREMENT AND CONTRACTING

We contract with many partners to purchase goods and services needed to conduct our business. Each contract must be entered into in a fair, ethical and legal manner. CenterLight Healthcare has a policy and process designed to help select vendors and partners on the basis of business criteria and to avoid the influence, or appearance of influence, of non-business factors. To be valid, agreements must follow our policies and be approved by an Officer with the authority to commit us to a vendor or partner.

ACCEPTANCE OF GIFTS

Workforce members and their immediate families are not allowed to accept or offer gifts, payment, entertainment or other favors that might influence or appear to influence business judgment.

Therefore, you should not directly or indirectly ask for or accept anything of personal benefit, including, but not limited to:

- Cash or payment
- Bribe
- Commission
- Kickback
- Loan
- Discount
- Gift
- Good
- Service
- Promise of employment
- Favor
- Entertainment
- Special accommodation
- Any item of material value from vendors, participants, caregivers, contractors, competitors, or other individual or organization doing or seeking to do business with us

THE CODE IN ACTION

Q: Your friend works in the Purchasing Department. A vendor is offering a reward system for purchases to recognize its valued customers. She will earn points for every purchase made by CenterLight Healthcare. Your friend is excited because points can be redeemed for gift cards and movie tickets. This doesn't sound right to you. What should you do?

A: Remind her that these rewards could be interpreted as inducements for using this vendor over a different vendor and may influence the employee's purchasing decisions. Additionally, the rewards are not shared with the rest of the Department. It may appear then that the employee is making purchases with the vendor for their own personal gain, which is against CenterLight Healthcare Code of Conduct and policy.

Workforce members may occasionally accept business courtesies, such as:

MEALS

- You may accept or purchase a meal valued at \$20.00 or less per person in conjunction with a business purpose (i.e., meeting). The meal must take place at an appropriate time and location.
- Whenever possible, you should pay for your share of the meal.
- Meals purchased for vendors, must be approved by a Director or above.

THE CODE IN ACTION

Q: You're a nurse providing care to a well-to-do patient that has received numerous get well gifts. She expressed great appreciation for the care you gave her during her stay. She doesn't know what to do with all the gifts and says it would be a favor to her if you just took the gifts yourself. The total value is about \$200. You're unsure what to do. You don't want to insult her by not accepting her offer, but you're not sure how your colleagues will react.

A: It's very common for patients to want to express appreciation through gifts. While gifts of nominal value can be accepted for the department, the value of the gifts described is much more than nominal. Before accepting gifts, get permission from the Compliance Team. If the gifts can be accepted, then share them with the entire department.



GIFTS

Patients and Members

In accordance with the Centers for Medicare and Medicaid Services' requirement, the value of gifts offered to participants must not exceed \$15.00.

Employees

Gifts to employees valued at \$5.00 or less per person and are provided to a department or a group of employees (i.e., a fruit basket valued at \$50.00, divided among a team of 10) are permitted.

A cash gift or equivalent (i.e., gift certificate/gift cards) is not acceptable under any circumstances. Employees may never ask for gifts of any kind.

Vendors and Others

Employees may be authorized to give non-cash gifts to our vendors or others. Gift value may not exceed \$100.00 in a 12-month period.

Employees may never give gifts of any kind to government or elected officials.

Workforce members may not engage, directly or indirectly, in any practice that's intended – or appears intended – to influence how CenterLight Healthcare obtains goods or services.



Employees are strictly prohibited from soliciting or receiving donations from participants, families or caregivers.

FUNDRAISING AND DONATIONS

CenterLight Healthcare is a non-profit corporation. We can accept charitable donations to help fulfill our mission, better serve individuals, and improve our operations and services. If someone wishes to donate a gift or make a contribution, please direct them to info@centerlight.org. Please note:

- You may not seek out, ask for, or accept donations on behalf of CenterLight, unless you are directed to do so by the Compliance Team.
- All workforce members are strictly prohibited from soliciting or receiving donations from participants, families or caregivers, as well as from providers, vendors, suppliers, or others doing business with or served by CenterLight.
- Workforce members are not permitted to solicit other employees for support of causes unrelated to business during work hours.



CenterLight Healthcare is a not-for-profit organization and can accept charitable donations to fulfill our mission of providing quality care.

Consequences for Violating the Code of Conduct

Please remember, The Code of Conduct is here to safeguard our participants, workforce and our mission.

Non-compliance with the Code, our policies and procedures, or applicable laws and regulations can result in serious consequences.

These may also apply to those who do not report violations or who intimidate or retaliate against others.

CONSEQUENCES MAY INCLUDE:

- Disciplinary action
- Termination of employment or contract
- Civil and criminal charges and penalties
- Loss of professional licensure/certification
- Exclusion from participation in Medicare and/or Medicaid

REMEMBER

Your actions don't only impact you.

The choices we make impact our participants, organization and each other.



Thank you for reading the CenterLight Healthcare Code of Conduct!

Please sign the attestation on Relias to document that you have read and understand this document.

If you have any questions, important contact information is provided below.

IMPORTANT CONTACT INFORMATION



Compliance Hotline

1-855-231-0616
CenterLight.alertline.com

Human Resources
Department

347-640-6108

IT Security

347-640-6088
[informationsecurity@
centerlight.org](mailto:informationsecurity@centerlight.org)

