

## Standard Code & Business Ethics

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**SCOPE:** This policy applies to all Luminary Hospice full- and part-time employees, additionally, this applies to all Luminary Hospice temporary employees, contractors and consultants or other third parties working at Luminary Hospice.

**PURPOSE:** The purpose of the Standard Code and Business Ethics is to provide a clear picture on what can and cannot be done from a legal and ethical perspective in the workplace. The Standard Code and Business Ethics lays the foundation to create an organizational culture of inclusion, collaboration, safety, and an ethical work environment. Luminary Hospice ('The Company') is committed to providing a welcoming and safe environment for everyone regardless of gender, sexual orientation, age, race, color, ethnicity, disability, veteran, socioeconomic, and religious status.

### **POLICY:**

Luminary Hospice is serious about business ethics and legal liability. The Company has established several reporting mechanisms in the event that you become aware of an ethical or legal violation, including violation of the Company's Standard Code and Business Ethics.

As an employee of Luminary Hospice, you have the responsibility to obey and uphold the policies and guidelines outlined in the Standard Code and Business Ethics policy. The Standard Code & Business Ethics is to be upheld during all professional functions and events, including but not limited to business hours at the Company, during related extracurricular activities and events, while attending conferences, or other professional events on behalf of Luminary Hospice. This includes working in the field and communicating on the Company's resources to other Luminary Hospice employees, clients, vendors, or other third parties. The Standard Code and Business Ethics is meant to maintain the Company's reputation for quality, integrity, honesty, and respect.

At Luminary Hospice, we are committed to giving fair treatment to our patients, vendors, and fellow employees. To foster an inclusive work environment of fair treatment, open and honest communication is the best way to achieve this. We have outlined guidelines below.

- **Be welcoming.** We strive to be a company that welcomes and supports people of all backgrounds and identities. This includes, but is not limited to members of any race, ethnicity, culture, national origin, color, immigration status, social and economic class, sexual orientation, gender identity and expression, age, size, family status, political affiliation, religion, and disability status.
- **Be considerate.** Your work at Luminary Hospice will be used by other people, and you in turn will depend on the work of others. Any decision you make will affect users and colleagues, and you should take those consequences into account when making decisions.
- **Be respectful.** Not all of us will agree all the time, but disagreement is no excuse for poor behavior and poor manners. We might all experience some frustration now and then, but we cannot allow that frustration to turn into a personal attack. It's important to remember that a company where people feel uncomfortable or threatened is neither

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productive nor pleasant. Luminary Hospice employees should always be respectful when dealing with other personnel as well as with people outside of Luminary Hospice.

As a leader in the hospice home health industry, Luminary Hospice has outlined general clinical principles to follow from a legal and ethical perspective.

- All personnel will be responsible for providing quality care to patients inclusive of showing up to patient visits at their respective time and ensuring all proper documentation is completed in a time and accurate fashion.
- All personnel will be responsible for providing quality care to patients inclusive of remaining professional by not engaging in personal discussions, voicing personal opinions, offering medical advice to patients, families, or caregivers.
- All clinical personnel will follow clinical procedures as directed by their supervisor or Medical Director.
- All personnel referring patients to another organization (hospital, skilled nursing facility, etc.) will provide the patient of an explanation of any relationship that receiving organization, if any, including financial benefit to Luminary Hospice.
- All personnel will follow the organizations policies especially policies relating to appropriate admitting, transferring, referral, and discharging patients within the organization.
- All personnel will protect patient information by not disclosing patient information with others unless they are on the appropriate communication list.

As a leader in the hospice industry, Luminary Hospice has outlined general principles to follow from a legal and ethical perspective.

- All business practices must be done on an “arm’s length” basis, free of any kickbacks, bribes, secret commissions, gifts or favors. Customers and patients should be furnished with accurate information regarding services and products provided and billed fairly and correctly.
- Ensure you are following proper accounting and inventory control procedures. These are designed to protect the organization from bribes, kickbacks, and protecting the organizations assets. All Luminary Hospice employees must comply with internal and external audits.
- Ensure you are providing accurate information through reporting mechanisms and accounting records be properly maintained.
- To protect Luminary Employees against their independent business judgement appearing compromised, all Luminary Hospice employees are required to sign a Conflict-of-Interest document stating that they are not working for a customer, vendor, or competitor.
- Protect Luminary Hospice proprietary information by not discussion information about the Company, patients, customers, or vendors that can be used against us. This can include business development plans such as marketing plans, client lists, sales reporting, contract terms, pricing, etc. Additional information such as policies, procedures,

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protected health information (PHI) and information on pending or completed acquisitions are considered proprietary information.

- Avoid any action that creates perception that favorable treatment of outside entities was sought, received, or given gifts and gratuities in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment, or other benefits from persons or companies with whom Luminary Hospice does business or may do business with. Luminary Hospice employees should not feel entitlement to accept or keep business courtesies. In return, Luminary Hospice will not offer business courtesies and Synapse employees must assure that cannot be reasonably interpreted as an attempt to gain unfair business advantage. An employee may never use personal funds or resources. If you have questions on approved company procedures, please contact your direct supervisor.
- Company resources including, but not limited to equipment, material, information, time, and resources are provided for business purposes only.

### **REPORTING:**

The Luminary Hospice Compliance department is responsible for overseeing and implementing the Company's Standard Code and Business Ethics policy and compliance program, monitoring and promoting compliance with federal, state, and local laws, regulations, and requirements.

Luminary Hospice has many resources available to Luminary Hospice employees to help address ethical and legal issues. The Company has created a culture of open and transparent discussions on ethical and legal issues without the fear of retaliation. Luminary Hospice will not retaliate against any employee, who in good faith, reports ethical or legal concern.

1. Review Luminary Hospice Policies and Procedures
  - a. Majority of all policies and procedures are available online at the Luminary Hospice SharePoint. Read through relevant policies prior to addressing the issue.
2. Discuss the issue with your direct supervisor.
  - a. At Luminary Hospice, all management is trained to address issues in the workplace. After reviewing relevant policies, have a conversation with your direct supervisor and provide them the opportunity to address and solve the issue.
3. Speak to Luminary Hospice Human Resources Department
  - a. If your direct supervisor or department is unable to resolve the issue to your satisfaction, you can contact the Luminary Hospice Human Resources department directly.
4. Speak with Luminary Hospice Compliance Hotline or submit a claim online
  - a. If you are not comfortable with sharing the information with your direct supervisor or the Luminary Hospice Human Resources department directly,

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you may utilize the Company's compliance hotline and online compliance platform.

### **DISCIPLINARY ACTIONS:**

Employees who violate this policy may face disciplinary consequences in proportion to their violation. Luminary Hospice management will determine how serious an employee's offense is and take the appropriate action.