



STILL HOPES

Episcopal Retirement Community

CODE *of* CONDUCT

HANDBOOK





IN ADDITION TO STILL HOPES' MISSION AND VISION,
THE COMPLIANCE AND ETHICS PROGRAM ALSO
HAS A GUIDING MISSION AND VISION.

MISSION

To promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law and to otherwise make a good faith effort to detect and prevent misconduct.

VISION

Be the model for all other community's compliance programs, providing innovative, comprehensive education programs for team members and effective and wide-ranging monitoring programs.

GOALS

The program fosters a culture of compliance that promotes legal and ethical behavior in the workplace by creating processes that detect and prevent fraud, waste, abuse, and policy violations.

SCOPE OF THE CODE OF CONDUCT

The Still Hopes Code of Conduct covers compliance issues, laws, regulations, and guidelines that are relevant to Continuing Care Retirement Communities as they provide a wide range of healthcare services. This includes but is not limited to regulations and guidelines from: Medicare, DHEC, the Office of Inspector General, Internal Revenue Service, the Office of Civil Rights of the Department of Health and Human Services, Occupational Safety and Health Administration, and other federal and state regulatory and business entities.

The Code of Conduct is supported by our policies and procedures and should be read and understood jointly with those policies and procedures. All compliance related policies can be found by team members on Still Hopes University (SHU) or the shared G: Drive in the policy and procedure folder.

“Team members” are various individuals who are associated with Still Hopes. All individuals, including employees, contractors, volunteers, Directors, Board Members, and officers are members of our team in providing care and services to our residents.

Any questions regarding the policies in this Code of Conduct, compliance policies, or related references, should be directed to your immediate supervisor, department director, Human Resources, the Corporate Compliance Officer, or the Head Compliance Administrator.

COMPLIANCE PROGRAM MANAGEMENT

Corporate Compliance Official

The Friends Services for the Aging (FSA) Vice President of Compliance serves as the Corporate Compliance Officer. This position works in conjunction with the Head Compliance Administrator, Executive Team, and Board of Directors. The Corporate Compliance Officer is responsible for continued coordination with the Head Compliance Administrator for the development, implementation, training, monitoring, and enforcement activities related to the Still Hopes Compliance and Ethics Program.

Head Compliance Administrator

Responsible for coordinating the day-to-day compliance activities in conjunction with Friends Services Alliance (FSA) Compliance Services. These activities include

audits, responses to “report line” calls, and leading Still Hopes’ Compliance and Ethics Committee. As a function of this role, the Head Compliance Administrator also functions as the Privacy Officer. The Head Compliance Administrator serves as the compliance official.

Privacy Officer

Implements company policies and procedures, conducts educational programs, and administers reviews relating to the company’s privacy program.

Security Officer

Serves as the focal point person for security compliance-related activities. Charged with developing, maintaining, and implementing organizational policies and procedures, security audits, conducting educational programs, reviewing conduct of those assigned security responsibilities, and administering reviews relating to security program.

Executive Team

The Executive Team is comprised of the Chief Executive Officer (CEO), Health Services Director, and Chief Financial Officer (CFO). The CEO serves as a High Level Official.

Leadership Team

The Leadership Team is comprised of all Directors.

Compliance Committee

The Still Hopes Compliance Committee is comprised of: Chief Executive Officer (CEO), Health Services Director, Chief Financial Officer (CFO), Controller, Director of Nursing, Head Compliance Administrator, Human Resources Director, Director of Technology, Chaplain, backup Privacy Officer, backup Security Officer, and others as needed. The Head Compliance Administrator is the chairperson for this Committee. The Committee meets at least quarterly, and more frequently as needed.

**Please reach out to our Still Hopes Compliance Officials
if you have any questions or concerns.**

HILARY ROYER: Head Compliance Administrator 803.995.8080 | 803.960.8586

KARLA DREISBACH: Corporate Compliance Officer 215.960.8586

CODE OF CONDUCT

INTRODUCTION

Still Hopes believes the most priceless asset of an employee or the organization is its integrity. Its traditions of honesty and highly ethical conduct are a source of pride and trust. At every level of Still Hopes, all applicable laws and regulations are expected to be obeyed. Still Hopes will not tolerate efforts to achieve business objectives at the cost of violations of law and/or unscrupulous dealings.

At Still Hopes, everyone should feel comfortable to speak up, particularly with respect to ethical concerns. Directors have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions.

Still Hopes has a vision to exemplify a new expectation for senior living and believes that having a strong Compliance and Ethics Program helps to bring that vision to fruition.

The Code of Conduct is a guide to understanding Still Hopes’ expectations about appropriate workplace behavior; it will help you make the right decisions if you are not sure how to respond to a situation. All team members must comply with both the spirit and the letter of all federal, state, and local laws and regulations that apply to the healthcare and other services that our organization provides, as well as all laws that apply to our business dealings. Violations of these laws and regulations can result in severe penalties for Still Hopes as well as the individuals we do work with. These penalties include: financial penalties, exclusion from participation in government programs, and, in some cases, imprisonment.

As team members, we share a commitment to legal, ethical, and professional conduct in everything we do.

The success and reputation of Still Hopes as a provider of healthcare and other services depends on you, your personal and professional integrity, your responsibility to act in good faith, and your obligation to do the right things for the right reasons, 100% of the time.

As a team member, you are responsible for supporting the Code of Conduct in every aspect of your workplace behavior.

Your continued working relationship with our organization includes understanding and adhering to the Compliance and Ethics Program, in addition to all supporting policies and procedures.

TEAM MEMBER PROMISE

The People Of Still Hopes Determine Our Success.

All levels of leadership at Still Hopes are here to demonstrate and model the Values of Still Hopes and help each member succeed in their role.

Every leader should:

- Demonstrate and lead with care and compassion;
- Be engaged with residents, team members, the community, and professional social circles by fostering connections;
- Assure alignment with everyday practices and Still Hopes Mission, Vision, and Values;
- Encourage and promote professional and personal growth and opportunity for all team members;
- Celebrate team successes.

THE CODE OF CONDUCT DISCUSSES THE IMPORTANCE OF:

Care Excellence

Provide quality, compassionate, respectful, and clinically-appropriate care. All team members are expected to embody the Values of Still Hopes and practice the promises of the Care Promises Pledge in everything we do.

Professional Excellence

Maintain and promote ethical standards of healthcare and business practices.

Regulatory Excellence

Comply with federal and state laws, regulations, and guidelines that govern healthcare, housing services, and other services we provide.

A SHARED RESPONSIBILITY

As individuals and as an organization, we are responsible to many different groups. We must always act ethically and responsibly.

Any compromise in our standards can harm our residents, our co-workers, and our organization. Like every organization that provides healthcare, we do business under very strict regulations and close governmental oversight. Fraud, waste,

and abuse are serious issues. Sometimes even an innocent mistake can have significant consequences that could result in substantial penalties to Still Hopes or an individual team member.

All team members are required to complete training on the Code of Conduct as a condition of employment, or any other relationship. The Code of Conduct sets forth mandatory standards.

There is no justification for departing from the Code of Conduct no matter what the situation may be.

Every team member is responsible for ensuring that he or she complies with the Code of Conduct and all policies and procedures. Any team member who violates any of these standards and/or policies and procedures is subject to discipline, up to and including termination.

A PERSONAL OBLIGATION

We are each responsible for following the Code of Conduct in our daily work. We are also responsible for enforcing it.

This means that you have a duty to report any problems you observe or perceive, regardless of your role.

As a team member, you must help ensure that you are doing everything practical to comply with applicable laws. If you observe or suspect a situation that you believe may be unethical, illegal, unprofessional, or wrong, or you have a clinical, ethical, or financial concern, you must report it. If you fail to report noncompliance with the Code of Conduct, policies and procedures, or applicable federal or state laws, you will be subject to discipline up to and including termination.

Still Hopes will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, Still Hopes will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Every team member is expected to follow the Care Promises Pledge at all times. By re-attesting to the Code of Conduct yearly, every team member is reminded to embody these promises in order to exemplify our mission.

CARE PROMISES PLEDGE

- ✓ I will smile, introduce myself and offer a warm greeting to residents, families and staff.
- ✓ I will be kind and respectful to residents, families and staff at all times.
- ✓ I will arrive on time and prepared to focus on the residents' needs.
- ✓ When using the phone, I will have a pleasant voice and answer the phone correctly.
- ✓ I will follow the dress code and keep a professional attitude at all times.
- ✓ I will maintain eye contact and respond appropriately to residents, families and staff.
- ✓ I will play an active part in problem solving issues that arise before seeking out management.
- ✓ I will develop relationships in which each person is able to give and receive.
- ✓ I will address any issue that arrives with a positive attitude.
- ✓ I will keep the residents' best interests in mind at all times.
- ✓ I will treat fellow co-workers as I would like to be treated regardless of how they treat me.
- ✓ I will suggest opportunities for improvement privately and in a constructive manner.
- ✓ I will be open to suggestions on how to better serve our residents.
- ✓ I will proactively clean any area that I see needs cleaning and will ensure work orders are submitted.
- ✓ I will identify safety issues and address them as soon as possible.

REPORTING CONCERNS

Reporting Process

1. Talk to your supervisor.
2. If you do not want to talk to your supervisor, seek out another member of the leadership team or someone from Human Resources.
3. If you still have a concern, contact the Head Compliance Administrator or the Corporate Compliance Officer.

You may also call the toll free Report Line number at any time if you do not feel comfortable talking to any of these team members.

ANONYMOUS REPORT LINE

1.800.211.2713

All calls are confidential and you may call ANONYMOUSLY

The Report Line is available 24 hours a day, 7 days a week, for callers to report compliance-related issues.

You can make calls to the Report Line without fear of reprisal, retaliation, or punishment for your actions, other than a report that is blatantly malicious.

CARE EXCELLENCE

Your most important jobs are providing quality individualized care to our residents, offering compassionate support to our residents and working toward the best possible outcomes while following all applicable rules and regulations. Still Hopes aims to:

“Embrace a self-led service team approach to resident centered care and create a culture where residents are empowered to direct their daily lives in a place they call home.”

RESIDENT RIGHTS

Residents receiving healthcare and other services have clearly defined rights. A document describing these rights is provided to each resident upon admission and is posted in conspicuous locations throughout the organization for the residents' and your reference. It is important to treat all residents in a manner that preserves their dignity, autonomy, self-esteem, and civil rights in addition to respecting the residents' right to self-determination and autonomy.

ABUSE AND NEGLECT

Still Hopes will not tolerate any type of resident abuse or neglect – physical, emotional, verbal, financial, or sexual. Residents must be protected from abuse and neglect by team members, family members, legal guardians, friends, or any other person. This standard applies to all residents at all times. Still Hopes team members must care for our residents in a manner that promotes resident dignity and respect.

Abuse is the willful infliction of injury, unreasonable confinement, intimidation, or punishment with resulting physical harm, pain, or mental anguish. This presumes that instances of abuse of all residents, even those in a coma, cause physical harm, or pain or mental anguish.

Verbal Abuse - Any use of oral, written, or gestured language that willfully includes disparaging and derogatory terms to clients or their families, or within their hearing distance, regardless of age, ability to comprehend or disability.

Sexual Abuse - Includes sexual harassment, sexual coercion or sexual assault.

Physical Abuse - Includes hitting, slapping, pinching, kicking. The term also includes controlling behavior through corporal punishment or deprivation.

Mental/Emotional Abuse - Includes but is not limited by humiliation, harassment, threats of punishment or deprivation.

Involuntary Seclusion/Abandonment - Includes separation of a resident from other residents, from his or her room or confinement to his or her room against the resident's will or the will of the resident's legal representative.

Neglect - Failure of the facility, its employees, or service providers to provide goods and services to a resident that are necessary to avoid physical harm, pain, mental anguish or emotional distress. Self Neglect is always a form of elderly abuse.

Financial/Material Exploitation - Taking advantage of a resident for personal gain, through the use of manipulation, intimidation, threats, or coercion.

Any team member who abuses or neglects a resident is subject to termination. In addition, legal or criminal action may be taken.

Abuse and neglect MUST BE REPORTED IMMEDIATELY to your supervisor or other member of management.

The **Elder Justice Act** requires timely reports of any reasonable suspicion of a crime against a resident of a long term care facility.

It is imperative to report abuse or neglect immediately to your supervisor! Still Hopes' Administrator or designee must report all reasonable suspicion of abuse, neglect and exploitation to DHEC and local law enforcement within 2 hours or 24 hours if no serious bodily injury.

DO NOT call the Compliance Line for allegations of abuse or neglect. This does not fulfill the requirement of reporting immediately.

RESIDENT CONFIDENTIALITY/HIPAA

At the core of the Health Insurance Portability and Protection Act (HIPAA) regulation is the resident's basic right to have their health information kept confidential. All team members have been trained on the specifics of this law and must use and disclose medical, financial, or personal information only in a manner consistent with the HIPAA Privacy policies and procedures and state and federal law. You are responsible for keeping resident Protected Health Information (PHI) confidential.

PHI is defined as individually identifiable health information that is transmitted, verbal or written, or maintained in any form or medium, including electronic health information.

Any unauthorized exposure of PHI which compromises the security or privacy of information is a potential breach and must be reported immediately to your supervisor, Privacy Officer, or Head Compliance Administrator.

An easy way to determine if the use or disclosure of PHI is allowed is to remember TPO: Treatment, Payment, and Health Care Operations.

If the information being shared does not pertain to one of those categories, ask your supervisor or Compliance Administrator for guidance. For more information on our HIPAA policies, see Still Hopes University or the shared G:Drive, policies and procedures folder.

Minimum Necessary Information: Still Hopes will only share the minimum amount of PHI in order to accomplish the task at hand except as required by law.

All information is strictly confidential and can only be shared with those who have a “need to know” in the course of their role in Still Hopes.

For example, providing treatment to the resident, obtaining payments from their health plan(s), posting payments, and setting appointments are all examples of situations when a team member has a “need to know”. HIPAA laws make it illegal to share data with anyone that does not have the need to know or has not been authorized by the resident or patient to have access to the personal information that can possibly identify the resident or patient, or provide information about their medical care.

PROVIDING QUALITY CARE

At Still Hopes, we understand that our residents are the reason we are here. We also understand that in order to provide the highest quality service possible to those we serve, we must be dedicated and value each other’s contribution and provide constant support and help. Those who cannot work safely, cannot continue to work at Still Hopes.

At Still Hopes, you will find that the goal is to be caring for one another so that we can, in turn, care for those who cannot care for themselves.

To achieve the highest success, your efforts are essential.

Our primary commitment is to provide the care, services, and resources necessary to help each resident reach or maintain his or her highest possible level of physical, mental, and psychosocial well-being. Still Hopes has policies and procedures and provides training and education to help each team member achieve this goal.

PROFESSIONAL EXCELLENCE

The professional, responsible, and ethical behavior of every team member reflects on the reputation of our organization and the services we provide. Whether you work directly with residents or in other areas that support resident services, you are required to maintain our standards of honesty, integrity, and professional excellence, every day.

Remember and embrace the Care Promises Pledge!

HIRING AND EMPLOYMENT PRACTICES

Still Hopes is committed to fair employment practices. When hiring and evaluating, we:

- Recruit, hire, train and promote, into all job levels, the most qualified persons without regard to race, color, religion, sexual orientation, national origin, age, disability, genetic information, ancestry, marital status, military or veteran status, citizenship status, pregnancy and pregnancy-related conditions including childbirth, or any other reason prohibited by law. All promotions, transfer evaluations, compensation, and disciplinary actions also follow this policy.
- Conduct employment screenings to protect the integrity of our workforce and the welfare of our residents and team members.
- Require all who need licenses or certifications to maintain their credentials in compliance with state and federal laws. Documentation of current, up to date licenses or certifications must be provided.

Any suspension or revocation of any license or certification must be reported to HR immediately.

LICENSURE, CERTIFICATION AND EXCLUSION SCREENING

We are committed to ensuring that only qualified professionals provide care and services to residents. Practitioners and other professionals treating residents must abide by all applicable licensing, credentialing and certification requirements. In addition, every effort is made to validate licenses and certification through the appropriate state or federal agency.

Still Hopes is prohibited by federal law from employing, retaining, or contracting with anyone who is excluded from any federal or state funded programs. Screening of all team members through applicable databases is conducted prior to hire (or start of contract for business associates) and at a minimum of monthly thereafter.

Employee Relations

You are a member of a dedicated team of staff committed to service. To maintain an ethical, comfortable work environment, team members must:

- Refrain from any form of sexual harassment or violence in the workplace.
- Treat all colleagues and co-workers with equal respect, regardless of their national origin, race, color, religion, sexual orientation, age, gender identity, or disability.

- Protect the privacy of other team members by keeping personal information confidential and allowing only authorized individuals access to the information.
- Not supervise or be supervised by an individual with whom they have a close personal relationship.
- Behave professionally and use respectful communication at all times.

Workplace Safety

Maintaining a safe workplace is critical to the well-being of our residents, visitors, and co-workers. That is why policies and procedures have been developed describing the organization's safety requirements. Every team member should become familiar with safety regulations and emergency plans regarding fire, disaster, and working safely.

In addition to organizational policies, we must abide by all environmental laws and regulations.

If you notice a safety hazard, you must take action to correct it if you can and report it to your supervisor immediately.

Drug and Alcohol Abuse

Still Hopes Episcopal Retirement Community is committed to maintaining a team dedicated and capable of providing quality resident services. To that end, you are prohibited from consuming any substance that impairs your ability to provide quality services or otherwise perform your duties.

You may never use, sell, or bring on our property alcohol, illegal drugs, and/or narcotics or report to work under the influence of alcohol, illegal drugs, and/or narcotics. If a team member appears to have work performance problems they will be required to submit to a 10-panel drug and/or alcohol test and appropriate action will be taken, as necessary. If you have an addiction to drug use, you can report yourself and Still Hopes will work with you through treatment and recovery.

If you become aware of any improper diversion of drugs or medical supplies, you must immediately report the incident to your department supervisor, the Head Compliance Administrator, Human Resources, or use the Report Line. Failure to report a known instance of noncompliance with this policy may result in disciplinary action against you up to and including termination.

REPORT LINE 1.800.211.2713

ORGANIZATIONAL RELATIONS

Professional excellence in organizational relations includes:

- Complying with federal tax law to maintain tax exempt status under section 501(c)(3) of the Internal Revenue Code.
- Maintaining company privacy and keeping proprietary information confidential
- Avoiding outside activities or interests that conflict with responsibilities to, or brings discredit to, Still Hopes and reporting such activity or interest prior to and during employment.
- Allowing only designated management staff to report to the public or media.
- Assuring that Still Hopes complies with the licensing and certification laws that apply to its business.

PROPRIETARY INFORMATION

You may have access to, receive, or may be entrusted with confidential and/or proprietary information that is owned by Still Hopes Episcopal Retirement Community and that is not presently available to the public. This type of information should never be shared with anyone outside the organization without authorization from a member of the Executive Team.

GIFTS

We understand that our team members build close, familial like relationships with the residents at Still Hopes. It is important that all team members understand that you may not accept any tip or gratuity from residents and you may not receive individual gifts from residents. Also, you may not give gifts to residents.

You may not borrow money from nor lend money to residents; nor may you engage with residents in the purchase or sale of any item. No team member may accept any gift from a resident under a will or trust instrument except in those cases where they are related by blood or marriage.

Accepting monies, gifts, tips or gratuities (*any item of monetary value*) from residents, family members, or visitors of a resident or family member, at any time while an employee of Still Hopes will result in immediate termination. These statements apply whether or not the resident is deceased.

BUSINESS COURTESIES

Still Hopes prohibits any team member from offering, giving, soliciting, or accepting business or professional courtesies including entertainment and gifts that could be interpreted as attempts to influence decision making. Team members will only solicit or accept business courtesies, entertainment, or gifts with the prior written approval from the CFO. No permission will be granted if there is an active negotiation with the vendor. All other permissions are granted at the CFO's discretion.

CONFLICT OF INTEREST

A conflict of interest exists any time your loyalty to the organization is, or even appears to be, compromised by a personal interest.

All team members must seek guidance and approval from the CEO before pursuing any business or personal activity that may constitute a conflict of interest.

USE OF PROPERTY

Still Hopes protects the assets of the organization and ensures their authorized and efficient use. Theft, carelessness, and waste have a direct impact on the organization's viability. All assets must be used solely for legitimate business purposes. This includes respecting copyright and intellectual property laws. If unable to assess the copyright or intellectual property laws, never copy material and/ or download software without explicit permission from the creator.

COMPUTERS /INTERNET

Team members are expected to use computers, email, and internet/intranet systems appropriately and according to the established policy and procedure. You are not permitted to use the internet for improper or unlawful activity or download any games or music, without prior written approval.

Internet use can be tracked and how you use your time on the Internet is monitored.

You should have no expectation of privacy when you use our computers, email, and internet/intranet system.

VENDOR RELATIONSHIPS

Still Hopes takes responsibility for being a good client and dealing with vendors honestly, ethically and with integrity.

We are committed to fair competition among prospective vendors and contractors for our business. Only a member of the Executive Team is authorized to enter into any written or verbal contract with any vendor for the provision of any product or service. Business arrangements must be detailed in writing and approved by management. Agreements with contractors and vendors who receive resident information, with the exception of care providers, will require a Business Associate Agreement (BAA) as defined by HIPAA and in accordance with our policy. Business Associates shall follow and attest to Still Hopes Policies and Procedures, Code of Conduct, and provide assurance that they will not disclose any PHI.

Contractors and vendors who provide resident/patient care, reimbursement, or other services to resident beneficiaries of federal and/ or state healthcare programs are subject to the Code of Conduct and must:

- Maintain defined standards for the products and services they provide to us and our residents/patients.
- Comply with all policies and procedures as well as the laws and regulations that apply to their business or profession.
- Maintain all applicable licenses and certifications and provide evidence of sanction screening, current workers compensation, and liability insurance as applicable.
- Require that their employees comply with the Code of Conduct and the Compliance and Ethics Program and related training as appropriate.

Failure to adhere to the BAA may result in termination of the contract.

MARKETING AND ADVERTISING

We use marketing and advertising activities to educate the public, increase awareness of our services, and recruit new team members. Every attempt will be made to assure that these materials and announcements, whether verbal, printed, or electronic, will present only truthful, informative, non-deceptive information.

REGULATORY EXCELLENCE

We are all responsible for learning and staying current with the federal, state, and local laws, rules, and regulations, as well as the policies and procedures that apply to our job responsibilities. Still Hopes aims to utilize and strive for best practice standards in all areas of our business.

BILLING AND BUSINESS PRACTICES

We are committed to operating with honesty and integrity.

Therefore, all team members must ensure that all statements, submissions, and other communications with residents/patients, prospective residents/patients, the government, suppliers, and other third parties are truthful, accurate, and complete.

Still Hopes is committed to ethical billing practices and expects you to be vigilant in maintaining Still Hopes' standards at all times. We will not tolerate any false or inaccurate coding or billing. Any team member who knowingly submits a claim, outside of Still Hopes' standards, or provides information that may contribute to submitting a claim inconsistent with Still Hopes' standards, such as falsified clinical documentation, is subject to termination. In addition, legal or criminal action may be taken.

If you observe or suspect that false claims are being submitted or have knowledge of a prohibited practice, you must immediately report the situation to a supervisor, the Compliance Administrator, or call the Report Line. Failure to report a known prohibited practice will subject you to disciplinary action up to and including termination.

REPORT LINE 1.800.211.2713

FINANCIAL PRACTICES AND CONTROLS

Ensuring that financial and operating information is current and accurate is an important means of protecting assets. All team members must ensure that all information provided to bookkeepers, accountants, reimbursement staff, internal and external auditors, and compliance staff is accurate and complete.

This includes ensuring the accuracy of clinical documentation which supports our reimbursement.

We must also comply with federal and state regulations when maintaining clinical records, accounting records and financial statements, and cooperate fully with internal and external audits.

REFERRALS AND KICKBACKS

Team members and related entities often have close associations with local healthcare providers and other referral sources.

To demonstrate ethical business practices, we must make sure that all relationships with these professionals are open, honest, and legal.

Resident/patient referrals are accepted based solely on the clinical needs and our ability to provide the services. Still Hopes never solicits, accepts offers, or gives anything of value in exchange for resident/patient referrals or in exchange for purchasing or ordering any good or service for which payment is made by a federal health care program.

Accepting kickbacks is against our policies and procedures and also against the law. A kickback is anything of value that is received in exchange for a business decision such as a resident/patient referral.

You cannot request, accept, offer, or give any item or service that is intended to influence, or even appears to influence, the referral, solicitation, or provision of healthcare services paid for by any private or commercial healthcare payer or state healthcare program, including Medicare.

DOCUMENT CREATION, USE, AND MAINTENANCE

Every team member is responsible for the integrity and accuracy of documents, records, and e-mails including, but not limited to, resident/patient medical records, billing records, and financial records.

No information in any record or document may ever be falsified or altered.

Appropriately documented error correction and edits accepted.

You must not disclose, internally or externally, either directly or indirectly, confidential information except on a need to know basis and in the performance of your duties. Remember, TPO. If the information doesn't pertain to Treatment, Payment, or Healthcare Operations do not disclose the information. Disclosure of confidential information externally must follow organization policies found in the employee manual and shared G: drive.

VOLUNTARY DISCLOSURE

It is our policy to voluntarily report known overpayments and any improper/irregular conduct, including fraudulent conduct, which affects any federal or state healthcare program. Reporting will be completed within the time frames identified under the Patient Protection and Affordable Care Act.

GOVERNMENT INVESTIGATIONS

Still Hopes is committed to cooperating with requests from any governmental inquiry, audit, or investigation. You are encouraged to cooperate with such requests, conscious of the fact that you have the following rights:

- You have the right to speak or decline to speak;
- You have the right to speak to an attorney before deciding to be interviewed; and
- You can insist that an attorney be present if you agree to be interviewed.

In complying with our policy you must not:

- Lie or make false or misleading statements to any government investigator or inspector;
- Destroy or alter any records or documents;
- Attempt to persuade another team member or any person to give false or misleading information to a government investigator or inspector; or
- Be uncooperative with a government investigation.

If you receive a subpoena or other written or oral request for information from the government or a court, contact your department director AND the CEO immediately.

DISCIPLINARY ACTION

Disciplinary action will be taken against anyone who fails to act in accordance with this Code of Conduct, the Compliance and Ethics Program, supporting policies and procedures, and applicable federal and state laws. Disciplinary action may be warranted in relation to not only violators of the Compliance and Ethics Program but also to those who fail to detect violations or who fail to respond appropriately to a violation, whatever their role in the organization.

COMPLIANCE QUESTIONS

The Compliance and Ethics Program is designed to create a culture of compliance at Still Hopes.

The laws applicable to our operations are numerous and complicated. When you are not sure whether a particular activity or practice violates the law or the Compliance and Ethics Program, make it your practice to ask your supervisor, Human Resources, the Compliance Official or call the Report Line.

CONCLUSION

The Compliance and Ethics Program is critical to Still Hopes Episcopal Retirement Community's continued success. You are crucial in ensuring the integrity of Still Hopes.

The Code of Conduct and the Compliance and Ethics Program set standards for the legal, professional, and ethical conduct of our business.

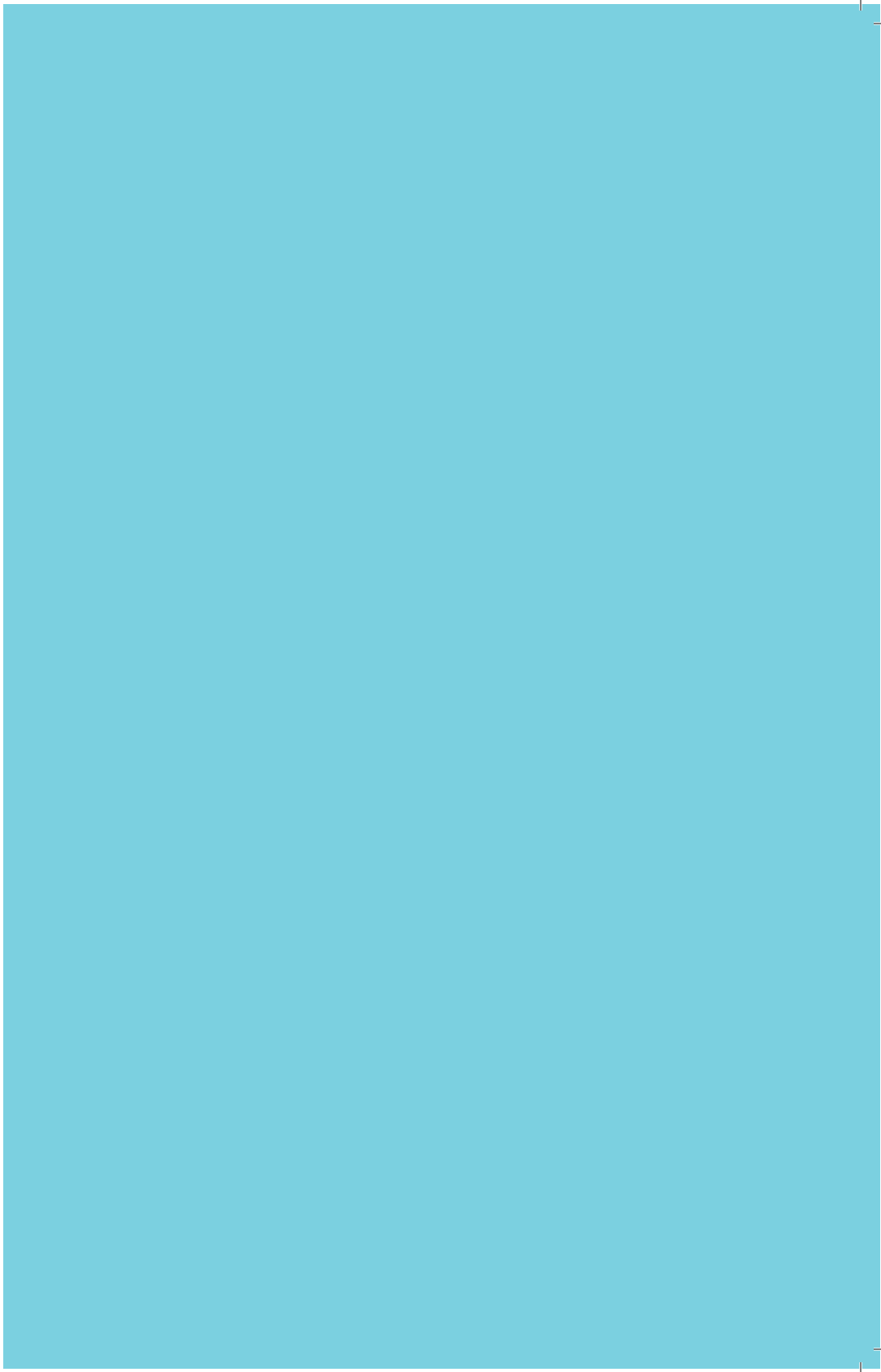
Still Hopes Episcopal Retirement Community and all of our team members are committed to personal and organizational integrity, to acting in good faith, and to being accountable for our actions.

The Compliance and Ethics Program is an ongoing initiative designed to foster a supportive work environment, provide standards for clinical and business conduct, and offer education and training opportunities for team members.

The success of the Still Hopes Compliance and Ethics Program depends on our collective and individual commitment to act with integrity, both personally and as an organization.

As a team member, your duty is to ensure that you and the organization are doing everything practicable to comply with applicable laws. You are expected to satisfy this duty by performing your responsibilities in accordance with professional standards, the regulations guiding our business practices, and our policies and procedures.

NOTES:



HILARY ROYER
HEAD COMPLIANCE ADMINISTRATOR
803.960.8586 Cell | 803.995.8080 Office

KARLA DREISBACH
CORPORATE COMPLIANCE OFFICER
215.646.0720

REPORT LINE (*ANONYMOUS 24/7*)
1.800.211.2713

FSA COMPLIANCE SERVICES
Friends Services Alliance, along with the Brethren,
Mennonite, and Quaker organizations involved in providing services
to the elderly, have established a collaborative Compliance and
Ethics Program known as the FSA Compliance Services .
Still Hopes is currently a member of FSA Compliance Services.

FSA
670 Sentry Parkway, Suite 120
Blue Bell, PA, 19422-2325
215.646-0720



STILL HOPES

Episcopal Retirement Community

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