

Sevita™

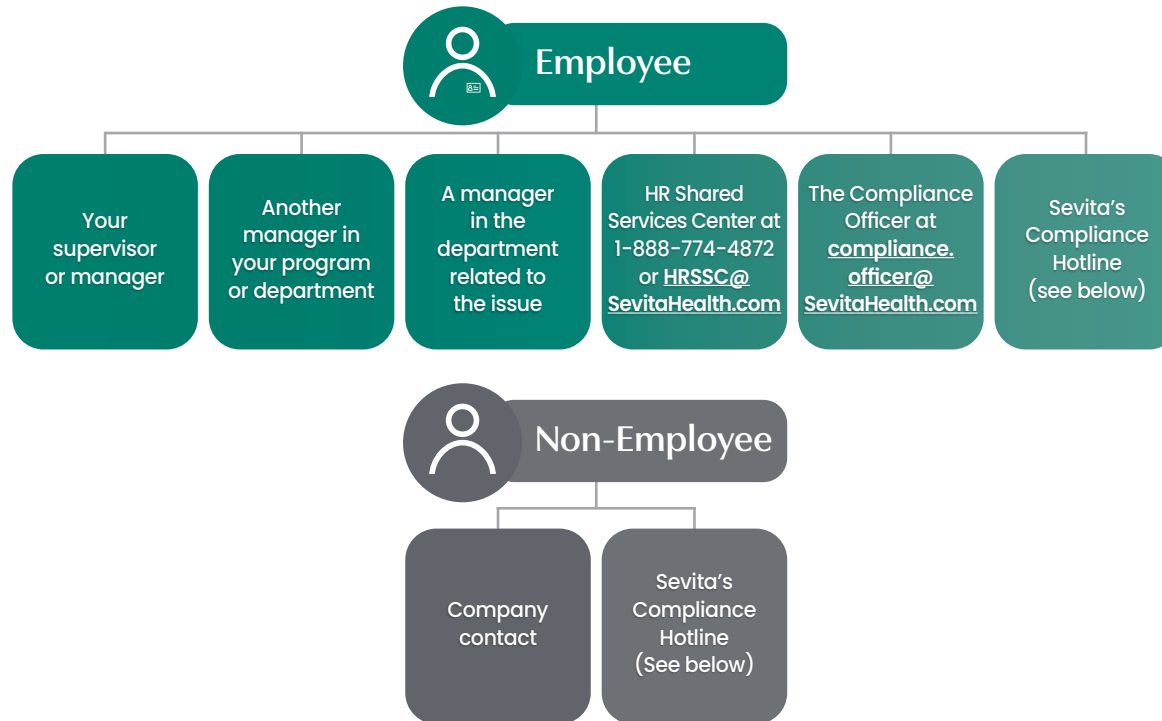
Code of Conduct for Employees





How to ask questions & report concerns

If you have questions or concerns, you can go to:



For more information on these options, please see [pages 30-31](#).

Retaliation Prohibited

Sevita will not tolerate any retaliation against anyone who makes a good faith report of a suspected violation of a law, regulation, policy or this Code, or who cooperates in the investigation of such a report. Suspected or alleged retaliation must be reported so that the Company has an

opportunity to look into it and address it as appropriate. As with any concerns under this Code, you can report suspected retaliation to your supervisor, to another member of management, to a management member of the Human Resources team, or to the Compliance Hotline.



Compliance Hotline 1-800-297-8043

www.mentornetwork.ethicspoint.com or for additional assistance due to a disability dial 7-1-1 to access Telecommunications Relay Services (TRS) and request connection to the Compliance Hotline at 800-297-8043.



Message from the CEO



Sevita's success as a premier provider of home and community-based specialized health care is rooted in the skill and dedication found throughout our company. Together, we have a responsibility to provide high-quality services and earn the trust of the people we serve, their families, our partners and communities.

We do that by conducting our work honestly and ethically, treating each other with respect, acting with integrity, and adhering to the laws and policies that support our mission and core values.

This Code of Conduct provides you with an easy-to-follow guide to the standards we all must uphold. Each of us is responsible for our actions. We can also help each other follow the conduct expectations, policies and procedures. How we conduct ourselves day-to-day is essential to fulfilling the commitment each one of us has made to Sevita's mission and core values.

In order to live up to that commitment, we rely on the guiding principles in this document and the dedication of everyone at Sevita, from members of the Board to all levels of management and to those providing direct support, to adhere to these principles.

The pages that follow are not intended to answer every question or address every situation, but they do offer important guidance and information on where to go when you have questions or concerns. Please read this Code of Conduct carefully, refer to it, and ask questions, share ideas and provide feedback. At Sevita, trust, transparency and confidentiality are essential to our work and relationships.

Thank you for all you do to support our mission and enhance the lives of others.

Sincerely,

William McKinney

Chief Executive Officer

Sevita



Our Mission & Values

Our mission is to offer adults, children and their families innovative, quality services and supports that lead to growth and independence, regardless of the physical, intellectual or behavioral challenges they face.

Our core values serve as a guide for how we look inward, how we act outwardly, how we come together and how we move forward. They're at the heart of everything we do to carry out our mission.

We do the right thing even when no one is watching. We build credibility by mirroring our words with actions. We earn each other's trust.

Integrity



We approach our work with humility, recognizing the value each person brings. We listen, and we follow through. We build caring relationships with the individuals we serve and within our teams and communities.

Respect



We embrace, celebrate and value diversity. We create a safe and welcoming space for all people. We act as passionate champions for each other and the people we serve.

Inclusion



We learn from our mistakes and strive to be better every day. We proactively share ideas and support each other to grow and develop. We work to expand our reach and improve more people's lives.

Growth





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About this Code of Conduct & our responsibilities

This Code of Conduct guides how we work. It also lets the people and communities we interact with know what they can expect of us.

Our Responsibilities

At Sevita, we strive to live our core values every day. This means we must:

- Understand and follow our Code of Conduct, as well as the policies, laws and regulations related to our role
- Meet our responsibilities to the people we serve, one another and our communities
- Speak up, ask questions and report possible violations

Supervisor Responsibilities

Employees look to people managers at all levels of our organization to model our core values and conduct expectations. To help employees fulfill their responsibility to the Code of Conduct, people managers must:

- Make sure your teams have the information and training they need to do their job well
- Be available to answer questions about appropriate behaviors
- Remain alert to situations or actions that may be unethical or potentially damaging to our reputation and take prompt action to address them

How do I acknowledge that I read the Code?

Every employee is required to acknowledge through Dayforce that they have read and understand the Code. As an employee, you must agree to follow our Code and report any violations. You may also be asked to attend trainings and reread the Code as a refresher or to accept updates.

How will I know if changes are made to the Code?

Our Code may be updated from time to time without notice. We recommend that you reference an electronic copy of the Code, available on Sevita's website and in Dayforce. Copies of the Code that are saved locally or printed may not be up to date.





What happens if I violate the Code or other company policy?

Violations to the Code are taken seriously. When someone reports possible misconduct, we review it carefully. We take steps to correct misconduct and may take disciplinary action if necessary. If an employee violates the law, they may face civil or criminal action.

To whom does this Code apply?

This Code of Conduct applies to all employees and the Board of Directors of Sevita, including its partners and affiliated entities.

Where can I ask questions or report concerns?

Sevita has an “open door” policy. We encourage our employees to bring any job-related problems, questions or concerns directly to your supervisor as soon as possible. If you are not comfortable going to your supervisor, you may reach out to:

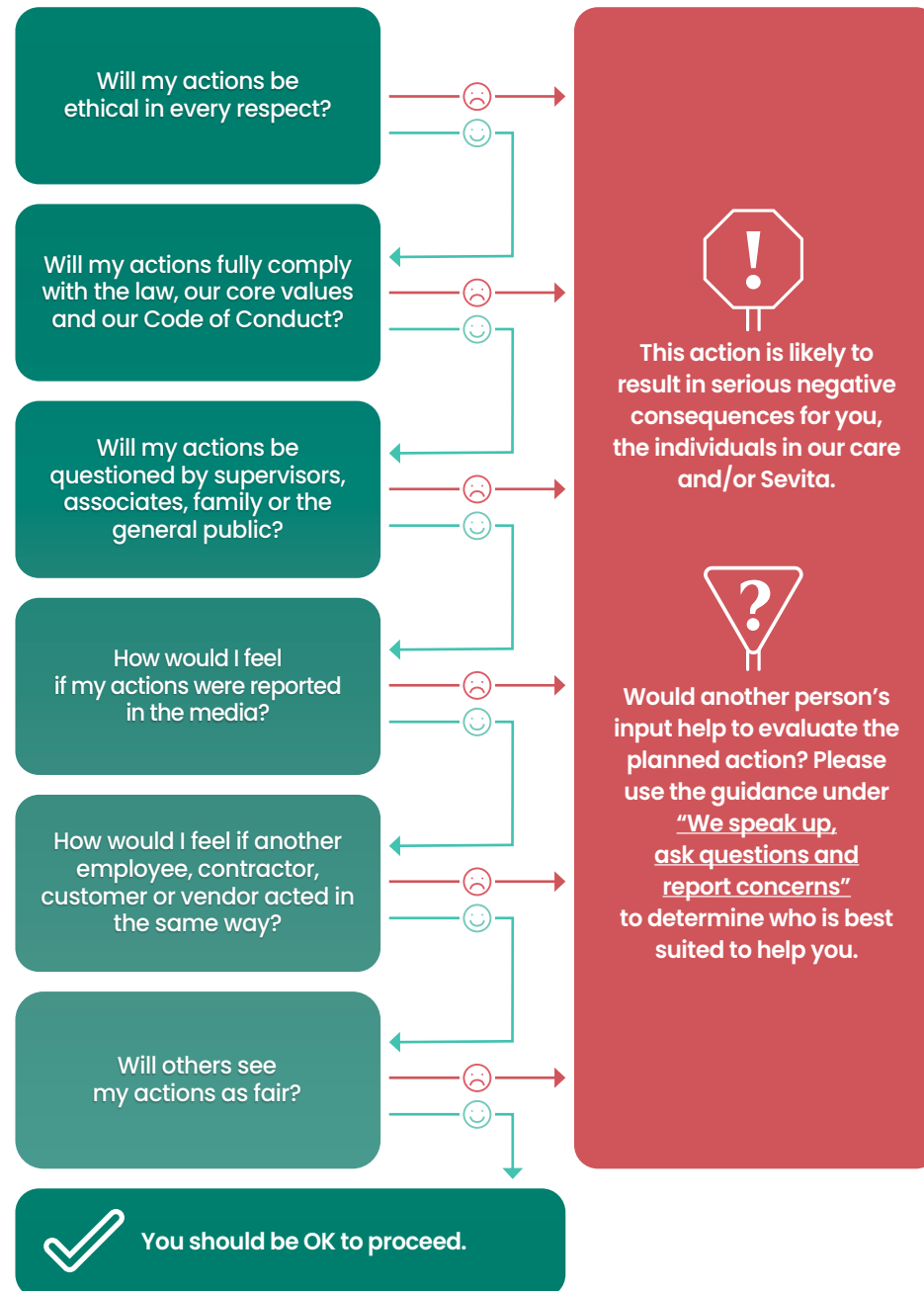
- Another manager,
- the Human Resources Shared Services Center at 1-888-774-4872 or HRSSC@SevitaHealth.com,
- the Compliance Officer at compliance.officer@SevitaHealth.com,
- the Compliance Hotline at 1-800-297-8043, www.mentornetwork.ethicspoint.com, or for additional assistance due to a disability dial 7-1-1 to access Telecommunications Relay Services (TRS) and request connection to the Compliance Hotline at 800-297-8043.





Guidance for making good decisions

The following questions can help you decide if the action you plan to take is in line with our Code of Conduct. If you are uncertain about the answers to the questions in any way, please do not hesitate to ask for help. We encourage you to reach out to your supervisor, another manager, the HR Shared Services Center or the Compliance Officer.





We meet legal and regulatory requirements.

Why It Matters

There are many laws and regulations that affect how we provide services and do business. If we do not comply with these requirements, it could lead to serious consequences for our company, the people we serve, our teams and the broader community.

Our Expectations

We follow all laws and regulations. We also meet legal and regulatory mandates to support the people we serve in making choices based on what is important to them.

How We Do It

✓ What to Do

- Make sure all legal and regulatory submissions, including documentation of services we provide, are accurate and timely
- Participate in provided trainings to learn about specific laws and regulations relevant to your job
- Be responsive to and notify your supervisor immediately of any legal or regulatory violations, notifications or inquiries

✗ What Not to Do

- Do not do anything that is improper or unlawful to get business or referrals
- Do not make or tolerate false statements
- Do not destroy any records without checking with your supervisor and the Document Retention Schedule, available from your supervisor or the Sevita Libraries

The Give & Take of Fraud, Kickbacks and Bribes

Examples of What Not to Do

FRAUD	<ul style="list-style-type: none">• Submitting a billing record for services that were not actually provided
KICKBACK	<ul style="list-style-type: none">• Referring a new employee to the organization and splitting the referral incentive money with them• Paying a consulting Medical Director more than the market rate for their consulting services if they refer patients to us
BRIBE	<ul style="list-style-type: none">• Offering money or gifts to incentivize people to join our programs (e.g., hotel rooms for families looking at our programs)• Offering someone gifts or money to stop them from sharing business-related information (e.g., "I'll give you \$5 if you don't tell anyone I was late to work today.")



We understand relevant laws and requirements when submitting bids or proposals.

Why It Matters

Laws governing our services are complex and vary from state to state, across services and even locally. We must understand and follow these regulations to continue providing the support our communities need.

Our Expectations

When entering into a contract with a government agency or department, we understand the laws and requirements in that specific location. We reach out to the Compliance Officer at compliance.officer@SevitaHealth.com to ask for guidance as needed.

We conduct background checks in accordance with regulations.

Why It Matters

Background checks help us protect the safety and security of the people we serve and our employees. Sevita does not hire or do business with people who are not eligible to participate in federal health care programs, such as those barred by the following:

- The Office of the Inspector General (OIG) List of Excluded Individuals and Entities (LEIE)
- State Medicaid sanctions list

Our Expectations

We disclose to a member of Human Resources any criminal conviction and any exclusion from federal health care programs.





We maintain necessary licenses and credentials.

Why It Matters

Licensing and credentials help make sure we have the skills and knowledge we need to meet the responsibilities of our roles.

Our Expectations

We must maintain proper licensing and credentials. Each of us is responsible for knowing the credential(s) and/or licensing requirement(s) for our position and keeping them current. If you are uncertain, please ask your supervisor.

How We Do It

✓ What to Do

- Monitor your skills and certifications and submit new and updated documentation to your manager to be added to your employee record
- Provide documentation of necessary licenses and credentials upon request
- Notify your supervisor in the event your license or other credentials become suspended, restricted or change in any way

We maintain a drug- and alcohol-free environment.

Why It Matters

We comply with drug- and alcohol-related legal requirements and support an environment that promotes the welfare of the people we serve and our employees.

Our Expectations

We strive to maintain a drug- and alcohol-free environment wherever employees work. We comply with the federal Drug-Free Workplace Act of 1988 and state law, and uphold the Drug- and Alcohol-Free Workplace and No Smoking guidance detailed in the Employee Information Guide on the Employee Portal.





We do not abuse, exploit or neglect people.

Why It Matters

To protect the well-being of the people in our care, we must do everything in our power to prevent abuse, exploitation and neglect. Under state law, most of our employees and independent contractors are also considered mandated reporters and required by law to report observed or suspected abuse, exploitation and neglect.

Our Expectations

We require anyone who observes or suspects physical, sexual, psychological or financial abuse, neglect or exploitation to report it immediately to the state-mandated abuse reporting agency or hotline and to your immediate supervisor.



How We Do It

✓ What to Do

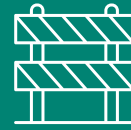
- Make every possible effort to prevent physical, sexual, psychological and financial abuse
- Report any concerns of abuse, neglect or exploitation immediately
- Keep accurate records related to the people we serve
- Take steps to protect the property and funds of the people we serve:
 - Follow local protocols for using ATM or debit cards that belong to the people we serve
 - Match purchased items to receipts and indicate for whom they were purchased
 - Confirm each item is received by the person for whom it was purchased
 - Keep confidential financial information secure and protected

Follow our company's [gift guidelines](#) when receiving gifts from the people or families we serve



✗ What Not to Do

- Do not engage in any sexual activity with people we serve
- Do not engage in or permit sexually abusive behaviors toward others, including but not limited to:
 - Sexual advances
 - Threats related to any sexual activity or advance
 - Visual conduct such as leering, making sexual gestures or displaying sexually suggestive pictures
 - Sexual “kidding” or “teasing”
 - Jokes or comments about gender-specific traits
 - Making or using derogatory or suggestive comments, epithets, slurs or other verbal remarks of a sexual nature
 - Sexually degrading words used to describe a person or group
 - Suggestive or obscene photos, notes or invitations
 - Physical conduct such as touching, petting, pinching, brushing against another’s body, assault, impeding or blocking movement
- Do not use anyone’s personal identifying information without permission
- Do not borrow or loan money to the people we serve or their families
- Do not request or offer to sell or buy merchandise or services to the people we serve or their families
- Do not collect signatures, conduct membership drives, elicit membership in clubs or organizations, or engage in any other similar activity with the people we serve or their families



Setting Professional Boundaries

Establishing boundaries with the people in our care helps us create safe connections to meet their needs. Violating these boundaries can result in confusion, distress and harmful consequences. These are some common boundary violations to avoid:

- Soliciting donations from or selling goods/services to a person we serve
- Accepting substantial gifts or gratuities from a person we serve
- Secretive behavior
- Breaking confidentiality
- Excessive self-disclosure of personal information
- Spending time with a person we serve outside of work
- Sexual relations with a person we serve
- Connecting with the people and families we serve on social media



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We uphold honest and accurate financial practices.

Why It Matters

Honest and accurate financial practices help us maintain the trust of the people we serve and our partners. Our practices also support the financial health of our programs and ability to carry out our mission.

Our Expectations

We adhere to truthful and ethical billing, accounting and financial reporting practices.

If you discover or suspect a false or misleading item in a financial report or entry, you must report it immediately to your supervisor or to the Compliance Officer at compliance.officer@SevitaHealth.com.





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How We Do It

✓ What to Do

- Accurately record time worked
- Respond promptly to any complaint or question regarding a bill
- Document all services, case notes and financial transactions and do so accurately, in reasonable detail and on time
- Protect the property and funds of the people we serve (Reference our Fraud and Misappropriation Policy for additional details)
- Comply with our Travel and Business Expense Policy when seeking reimbursement for travel expenses or non-travel business expenses
- Inform your supervisor immediately if a payor or government organization requests to review our records, so that a program leader may notify the Compliance Officer at compliance.officer@SevitaHealth.com (Government Inquiries and Investigations Guidelines are available from your supervisor or the Sevita Libraries)
- Follow billing and payment guidelines from payors (e.g., Medicaid, private insurance, workers' compensation)
- Prevent and detect false claims, and promptly report any suspected violation of the False Claims Act or any other law

✗ What Not to Do

- Do not use a company credit card for personal use
- Do not falsely report revenue or earnings
- Do not forge or misuse a signature on a form, government filing or company report
- Do not sign on behalf of a person we serve or ask a person we serve or their guardian to sign a blank form
- Do not share financial or transactional information in exchange for something of value to you
- Do not bill people receiving services or their families, unless specifically authorized to do so





If you receive a report of suspected fraud, you must report it immediately to your supervisor and/or the Compliance Officer by email or through the [Compliance Hotline](#). A person who knows or suspects fraud and does not report it may be considered to have participated in that fraud. Failure to report fraud or misappropriation may result in disciplinary action up to and including immediate termination.

For more information about issues related to financial or accounting irregularities, please see our Fraud and Misappropriation Policy available from your supervisor or the Sevita Libraries.



I WAS SCHEDULED to work an 8-hour shift, but I only worked 6 hours. Can I record 8 hours if I know I will work an extra 2 hours tomorrow to make up the difference?

No, we expect that you always accurately record the time you worked. This is critical to paying you accurately for the time you worked. If you worked 6 hours during the shift, you must record 6 hours. When you work the additional 2 hours tomorrow, you will record that time tomorrow.

I WORK IN A GROUP HOME. I think that we accidentally billed for services. What should I do?

If you become aware that part or all of any invoice may be wrong (for example, an instance of overbilling because billed services were not provided or services were provided but were not authorized or reimbursable, or an instance of underbilling where additional services were provided but not billed), you must immediately notify your supervisor. We do not

tolerate any retaliation toward an employee who makes a good faith report of potentially inaccurate billing.

I WORK EVENINGS in a group home and was putting away groceries purchased by an employee on the day shift just before leaving for the day. I always match everything to the receipt, and a few items were missing. I hate to think that my colleague might have taken things from the home. What should I do?

First, you have a great practice of matching items to receipts. You must report this issue, and you can do so without accusing anyone; there are a lot of explanations for how this might have happened (for example, a bag from the store might still be in the employee's car, someone else might have put some things away, or perhaps a bag was inadvertently left at the store). You should tell your supervisor the facts—that you were unable to find some of the items on the receipt—and let them take it from there.



We resolve conflicts respectfully.

Why It Matters

Sevita is committed to providing a safe, violence-free workplace. Conflicts are a normal part of any work environment. When we engage in conflicts productively and resolve them respectfully, it helps us build stronger working relationships and better meet our mission.

Our Expectations

We strive to have a workplace where we openly communicate and solve problems in a mutually respectful way. Everyone is expected to embrace policies and practices that prevent violence and report any concerns of potential or suspected violence.

How We Do It

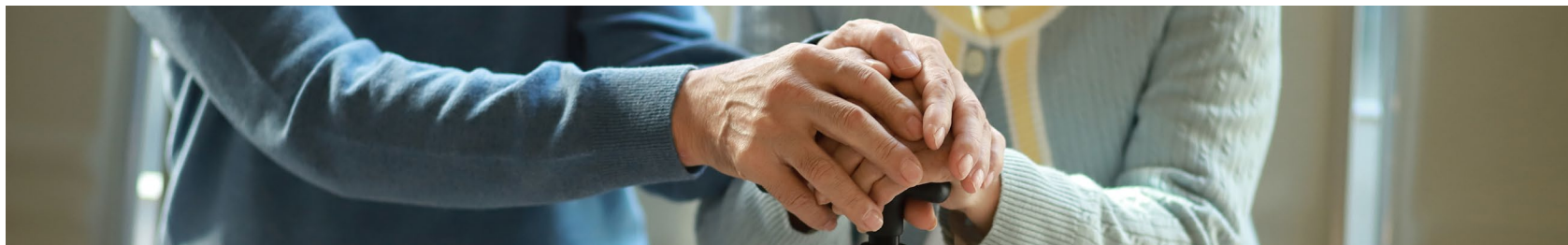
✓ What to Do

- Treat others with courtesy and respect
- Report all threats and instances of violence as soon as possible to your immediate supervisor, another manager, the Human Resources Shared Services Center, the Compliance Officer, the Compliance Hotline at 1-800-297-8043, or www.mentornetwork.ethicspoint.com. For additional assistance due to a disability dial 7-1-1 to access Telecommunications Relay Services (TRS) and request connection to the Compliance Hotline at 800-297-8043.

✗ What Not to Do

- Do not threaten or intimidate an employee, contractor, vendor or person we serve at any time, including when you are not working
- Do not engage in fighting, “horseplay” or other conduct that may be dangerous to you or to others
- Do not hit, shove or be physically aggressive, even if in a joking manner
- Do not stalk people
- Do not bring firearms or other weapons to work or leave them in a vehicle used to transport the people we serve

For more information on providing a safe and healthy workplace, see the “What We Expect” section of the Employee Information Guide, which is available on the Employee Portal.





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What is workplace violence?

Workplace violence appears in different forms. We all have a responsibility to promote a violence-free workplace by resolving conflicts respectfully.

- **Bullying behavior** is repeated, abusive conduct that is threatening, humiliating or intimidating, or that prevents work from getting done.
- **Disruptive behavior** disturbs, interferes with or prevents normal work functions or activities. Examples include yelling, using profanity, waving arms or fists, verbally abusing others and refusing reasonable requests for identification.
- **Threatening behavior** includes physical actions short of actual contact/injury (e.g., moving closer aggressively), general oral or written threats to people or property, (statements like “You better watch your back” or “I’ll get you”), as well as implicit threats (“You’ll be sorry” or “This isn’t over”).
- **Violent behavior** includes actions or words that endanger or harm others, as well as actions that lead a person to reasonably believe that they are in danger (e.g., throwing things, pounding on a desk or door or destroying property), or specific threats to inflict physical harm (e.g., a threat to shoot a named individual).





We promote a culture of inclusion.

Why It Matters

Our diverse workforce makes us strong as an organization by bringing together backgrounds, perspectives and cultures that reflect the individuals, families and communities we serve. We all benefit from a culture of inclusion that helps every person bring their best self to work each day. That's why Inclusion is one of our organization's core values. Discrimination and harassment are unacceptable and can have a disruptive effect on our work, our colleagues and the people we serve.

Our Expectations

We are sensitive to the concerns, values and preferences of others, and behave in a manner that supports and promotes a diverse and respectful environment. Team members who recruit, hire, train and promote employees are required to do so without regard to:

- Race
- Color
- Religion
- Creed
- Sex and gender
- Gender identity or expression
- Pregnancy
- National origin
- Sexual orientation
- Age
- Physical or mental disability
- Genetic disposition or carrier status
- Marital status
- Military or veteran status
- Any other category protected under applicable federal, state or local law

Any incident or situation that you believe involves possible discrimination should be brought to the immediate attention of your supervisor, another manager, the Human Resources Shared Services Center, the Compliance Officer, the Compliance Hotline at 1-800-297-8043 or www.mentornetwork.ethicspoint.com. For additional assistance due to a disability dial 7-1-1 to access Telecommunications Relay Services (TRS) and request connection to the Compliance Hotline at 800-297-8043.

For more information, see the “Freedom from Discrimination and Harassment” section of the Employee Information Guide, available on the Employee Portal.

Behavior or content (written, online or via social media) that is discriminatory, intimidating, hateful, bullying or threatening is never acceptable at our company.



We protect sensitive and private information.

Why It Matters

As part of our jobs, we may have access to private information about the people we serve, our employees and our business. We protect this information to keep people safe, respect each other's privacy and maintain others' trust.

Our Expectations

We handle personal, confidential and proprietary information with integrity and respect.



How We Do It

✓ What to Do

- Only share confidential or private information with authorized people when required and approved to do so
- Only access confidential or private information with the proper authorization
- Practice good habits to protect information:
 - Password-protect computers
 - Lock file drawers
 - Turn monitors away from hallways and other common spaces
 - Place documents face down when not actively referencing them
 - Encrypt or password-protect emails sent to people outside of our organization that contain personal health information or other confidential information

✗ What Not to Do

- Do not take private information home without proper authorization from your supervisor
- Do not leave private information in a place that could be accessed by someone who is not authorized
- Do not put confidential information on an external storage device, such as an external hard drive or USB flash drive



We safeguard information about people's identity and health.

Why It Matters

We have an obligation to protect the privacy of the people we serve. Safeguarding personal information about people's identity and health is critical to respecting their rights, keeping them safe and complying with the law.

Our Expectations

We uphold privacy laws and make every effort to keep sensitive and confidential personal information private.



Key Terms to Know

HIPAA: The Health Insurance Portability and Accountability Act (HIPAA) tells us how to use and share health information.

PHI: Protected Health Information (PHI) is information used to identify patients and deliver care including name, address, age, race, gender, marital status, treatment plans, medications, and any other medical documentation and information. Electronic personal health information stored on a computer or other devices is often called ePHI.

How We Do It

✓ What to Do

Refrain from using text messages to communicate about a person we serve. When it is necessary to text about a person we serve, include as little information as possible. For example, avoid using full names, locations or detailed health information.

- Follow guidelines when taking photos, video or audio, including:
 - Use our company's approved consent form to get written consent from everyone involved in advance
 - Submit content and documentation of consent to the Marketing Team

✗ What Not to Do

- Do not discuss the people we serve in public areas where others may overhear
- Do not discuss the people we serve with your family and friends online or in person
- Do not include unnecessary personal information on documents, such as data charts or trend reports
- Do not "check in" or "tweet" from locations when you are with a person served
- Do not share or refer to any information—such as a name, photo, or video—about or including a person served, when posting on social media
- Do not take photos or videos of the people we serve unless the Marketing Team directs you to do so and you have advanced written consent from everyone involved



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We secure confidential business information.

Why It Matters

We keep certain information about our business confidential so we can continue to deliver high-quality services, work toward our goals and serve more people.

Our Expectations

We properly and responsibly handle all information about our business, including financial and contract information. We do not disclose or use confidential information for any purpose other than our business.



**MY COWORKER
CONFIDED that
she is planning**

**to resign in two weeks to
work for a competitor. I
saw her making copies
of our agreements with
funding sources, including
our reimbursement rates.
Can she do that?**

It is difficult to be sure if what she is doing is appropriate without knowing more about her job duties. That said, you should report this concern to your supervisor. We prohibit employees from using our confidential information, such as reimbursement rates and contract terms, for purposes not related to our business.



We keep the property entrusted to us safe and secure.

Why It Matters

By protecting individual and company property, we are safeguarding the people we serve and building their trust.

Our Expectations

We secure company property, such as vehicles, computers and purchasing cards, while also protecting the personal property of the people we serve. The removal of any property should only be done with consent from the owner or, if company property, your supervisor.



We use company-issued technology appropriately.

Why It Matters

The protection of our technology is essential in our efforts to protect the privacy and rights of the people we serve.

Our Expectations

You may receive access to certain property or systems, such as computers, email and voicemail. We primarily use these for conducting business. Incidental personal use is allowed if it does not interfere with business activities and is in line with our Information Technology Policies available from your supervisor or the Sevita Libraries.

We protect all the data that is generated and stored on our systems and devices to ensure it's accessible for business purposes. This also helps us protect our company's reputation and minimize potential legal risks. When we use company-issued electronic equipment remotely or access our networks from remote locations (for example, at home or from other non-company locations), we follow the same standards of use as we do while on company premises.



We avoid and disclose potential conflicts of interest.

Why It Matters

A conflict of interest occurs when our actions conflict with our obligations to our organization. Conflicts of interest, as well as the appearance of conflicts of interest, hurt our ability to serve individuals and families, damage the trust others have in us and can threaten our reputation as an organization that provides quality services.

Our Expectations

We avoid any actions that may involve, or may appear to involve, a conflict of interest with the obligations of our job with Sevita. If you become aware of a conflict of interest, you must notify your supervisor immediately.

A conflict of interest may arise if we:

- Allow private interests, whether personal, financial or of any other sort, to conflict or appear to conflict with our professional responsibilities
- Interfere with Sevita's business on behalf of another company, such as recruiting for a competitor
- Act as a guardian or health care proxy of a person we serve

How We Do It

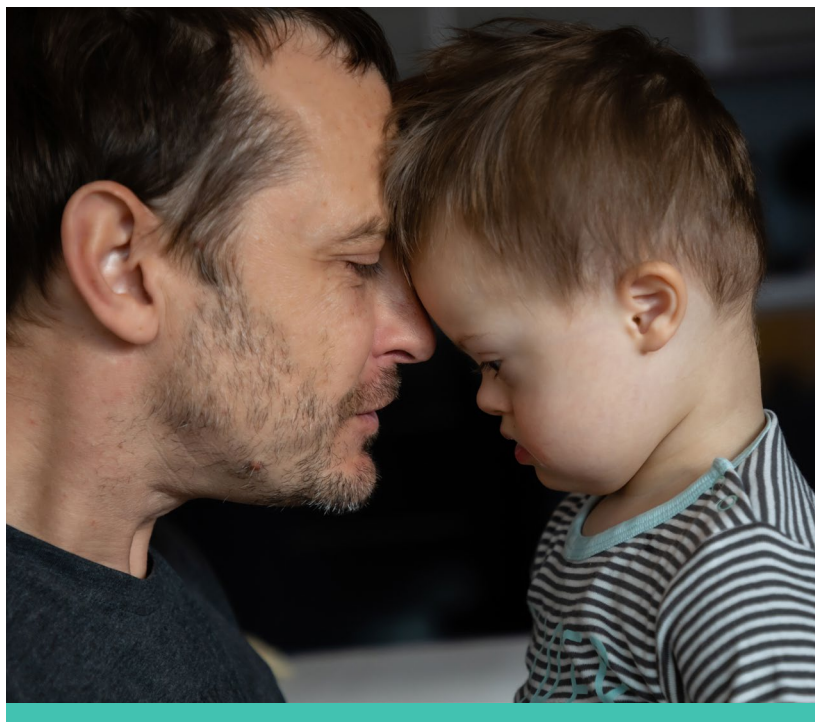
✓ What to Do

- Tell your supervisor about any other jobs you hold and work with your team to ensure outside work does not interfere with your ability to do your job at Sevita
- Discuss potential conflicts with your supervisor, another manager or Human Resources. If you cannot resolve the issue with a local manager, contact the Compliance Officer, the Compliance Hotline at 1-800-297-8043 or www.mentornetwork.ethicspoint.com. For additional assistance due to a disability dial 7-1-1 to access Telecommunications Relay Services (TRS) and request connection to the Compliance Hotline at 800-297-8043.
- Request approval at connect@SevitaHealth.com before making any donation or contribution (cash or non-cash) that involves Sevita's resources

✗ What Not to Do

- Do not engage in financial, romantic, sexual or other inappropriate personal relationships with the people we serve
- Do not engage in solicitation activities, such as personal fundraising activities, signature collections, membership drives, or the sale of goods or services, during work hours

For more information, see our Fraud and Misappropriation Policy available from your supervisor or the Sevita Libraries.



MY COUSIN IS a great landscaper, and our program needs someone to provide landscaping services. I don't have a financial interest in her business. Can I recommend her to Sevita?

Using a family member of an employee to provide services is called a "Related Party Transaction" and is generally prohibited by our company policy. To learn more about the process for requesting an exception, see our Related Party Transactions & Conflicts of Interest Policy available from your supervisor or the Sevita Libraries.





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Resources

We maintain appropriate workplace relationships.

Why It Matters

Every effort is made to reassign employees where necessary so that relatives and people in personal or intimate relationships are not in a supervisory or subordinate position with each other. In addition, we do not permit members of the same family or people in personal or intimate relationships to be the only people responsible for managing finances or property. For more information, see the Employee Information Guide available on the Employee Portal.

Our Expectations

We disclose to our supervisor and Human Resources any personal, intimate and/or family relationships with other employees, vendors or prospective employees or vendors.



MY STATE'S MEDICAID PROGRAM allows

family members to serve as direct care providers for the people we serve. Is this a violation of our Code?

Rules may vary from state to state. If you adhere to the rules established by your State Medicaid program, this does not violate the Code of Conduct.

**I SERVE A SMALL
COMMUNITY where it's
difficult to hire employees who
are not personally related.
What can I do to meet the
needs of our program while still
complying with the Code?**

Even in small communities, Sevita works to avoid reporting relationships among family members and people in personal or intimate relationships. In all cases, we strive to apply a fair, standard approach to scheduling shifts and approving time off.



We understand and adhere to appropriate gift guidelines.

Why It Matters

People who give and receive gifts in a business environment often have good intentions. However, gifts can create conflicts of interest or the appearance of conflicts of interest. Gift guidelines help us protect the people we serve and maintain the trust of others.

Our Expectations

We act with integrity when giving and accepting gifts in our work environment. We do not give, solicit or receive gifts in exchange for personal or professional gain.

How We Do It

✓ What to Do

- Decline any gift worth more than \$75 in value to adhere to Federal standards set by the Office of the Inspector General (OIG)
- Get approval from the Compliance Officer as appropriate, before purchasing fundraising tickets or making other non-cash contributions with company funds

✗ What Not to Do

- Do not give or accept gifts that place you under any obligation
- Do not give or accept gifts that could be interpreted as a bribe
- Do not provide gifts, payments or reimbursements to any individual government representative or employee
- Do not offer or give anything to a public official, either directly or through an intermediary, to secure a personal or professional advantage



Three Questions to Ask Before Accepting a Gift

If you are offered a gift from a third party who is a current or potential person or family we serve, vendor, supplier or independent contractor of Sevita, think about how you would answer the following questions:

- Is the gift of more than nominal value?
- Is this gift cash or a cash equivalent such as a gift card?
- If from a contractor or vendor, are you currently considering them for a new or renewed contract?

If your answer to any of these questions is "yes," then the gift may not be appropriate, and you should consult with your supervisor or ask the third party to understand that you are not able to accept it due to the perception that it may create.



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Hotline



Resources



A VENDOR I WORK WITH occasionally has offered me three tickets to a local, professional sporting event. Is it okay for me to go with two coworkers?

That depends—if the vendor is giving you the tickets as a gift then you must follow our organization’s rules for accepting only nominal gifts under our Fraud and Misappropriation Policy available from your supervisor or the Sevita Libraries. If the vendor will also be attending the game and wants to go with you as a networking or client development event for the vendor, that is okay so long as it is not a frequent practice, and you are not currently considering the vendor for additional work or a renewed contract.

AT HOLIDAY TIME EACH YEAR, a vendor I work with sends a basket of food. It is probably worth at least \$50. Is it okay to accept it?

If the value is under \$75 you can probably accept it unless you are currently considering that vendor for more work or a renewed contract. The best course of action is to share the basket with others at work so that it is not a personal gift to you. If the value is over \$75, our Fraud and Misappropriation Policy prohibits accepting the gift without permission of a Vice President-level employee or higher. In addition, you should express appreciation to the vendor while you request that future tokens of appreciation be more modest.





We represent ourselves fairly and accurately.

Why It Matters

We take pride in our reputation as a high-quality provider and good neighbor. Each one of us represents the face of Sevita and can help protect our strong reputation.

Our Expectations

We demonstrate our organization's core values in every public action and interaction.

How We Do It

✓ What to Do

- Represent our organization and the services we provide fairly and accurately
- Comply with the laws that govern copyright, fair use of material owned by others, trademarks and other intellectual property
- Adhere to our own copyrights, trademarks and branding guidelines

✗ What Not to Do

- Do not post or display content that is a public attack on the quality of our services in a manner that a reasonable person would perceive as intended to harm our business. See the Employee Information Guide for information on your rights under the National Labor Relations Act.
- Do not claim to represent Sevita on websites or social media accounts
- Do not speak to the media on Sevita's behalf unless expressly authorized to do so as outlined in our Media Policy



WHEN I POST COMMENTS on social media or to articles published online, can I include my name and where I work?

No employee should appear to be speaking on behalf of the company without permission from the Compliance Officer. If you are approached by any member of the media (including online or social media) for comment on any situation, record their contact information and immediately provide it to your supervisor, who will follow our Media Policy.



We speak up, ask questions and report concerns.

If you see or experience something that doesn't seem right, it may not be. If you are aware of any situation that goes against our values or our Code of Conduct, do something about it: Speak up! And encourage others to do the same.

Sevita has an “open door” policy, and you are encouraged to bring any job-related problems, questions or concerns directly to your supervisor as soon as possible. If you are not comfortable going to your supervisor, you may reach out to another manager, the Human Resources Shared Services Center, the Compliance Officer, or the Compliance Hotline (see the following paragraph).

Compliance Hotline

The Compliance Hotline is available every hour of every day and translation services into several languages are available. You can reach it by calling 1-800-297-8043 or online at www.mentornetwork.ethicspoint.com. For additional assistance due to a disability dial 7-1-1 to access Telecommunications Relay Services (TRS) and request connection to the Compliance Hotline at 800-297-8043. You can choose to provide your name or remain anonymous. A third-party company will take a report of your call and send that report confidentially to Sevita's Compliance Officer. Sevita will not attempt to determine where calls or online submissions come from.



We do not retaliate.

We want you to feel comfortable coming forward to ask questions and report concerns. We will not tolerate any retaliation against anyone who makes a good faith report of a suspected violation. We will investigate any claims of retaliation seriously and address them as appropriate.

You can report suspected retaliation to your supervisor, another member of management, the Human Resources Shared Services Center, the Compliance Officer, the Compliance Hotline, 1-800-297-8043, or www.mentornetwork.ethicspoint.com. For additional assistance due to a disability Dial 7-1-1 to access Telecommunications Relay Services (TRS) and request connection to the Compliance Hotline at 800-297-8043.



Non-Employees

Non-employees who have any questions about this Code or any concerns related to conduct of Sevita's employees or other third parties should bring concerns to the attention of their company contact, or they can call the Compliance Hotline at any time, 1-800-297-8043 or www.mentornetwork.ethicspoint.com. For additional assistance due to a disability Dial 7-1-1 to access Telecommunications Relay Services (TRS) and request connection to the Compliance Hotline at 800-297-8043.



How to Talk with Your Supervisor about a Conduct Issue

We know that sometimes it can feel difficult or intimidating to talk with your supervisor about a conduct issue. We recommend that you follow these steps:

1. **Be timely.** Reach out to your supervisor as soon as you have a question, concern or report of a conduct issue.
2. **Be specific.** Gather your thoughts so you are prepared to share as many details about the issue as possible, such as who was involved, when it happened and where it happened.
3. **Consider other channels as needed.** If your supervisor is not the right person to talk to, consider approaching another supervisor, the Human Resources Shared Services Center, the Compliance Officer, or report the issue to the [Compliance Hotline](#).

Share your ideas and feedback.

We value good ideas at Sevita. If you have a suggestion about how we can improve this Code of Conduct, better serve the people we support, expand our services, recognize the hard work and accomplishments of our employees, independent contractors and partners, or become more efficient and effective at what we do, we want to hear it. Please submit ideas and feedback to the CEO Suggestion Box.





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Referenced Policies and Guidance

- Employee Information Guide
 - Drug- and Alcohol-Free Workplace guidance
 - No Smoking guidance
- Fraud and Misappropriation Policy
- Government Inquiries and Investigations Guidelines
- Information Technology Policies
- Media Policy
- Related Party Transactions & Conflicts of Interest Policy
- Travel and Business Expense Policy

