

St. Camillus Health and Rehabilitation Center Code of Conduct

This Code of Conduct reflects St. Camillus' commitment to individuals receiving services and their families, to our community, and to our employees. As used in the Code of Conduct, the term "St. Camillus" refers collectively to St. Camillus Health and Rehabilitation Center, Integrity Home Care Services, Inc., their respective facilities and programs, and St. Camillus Foundation. The term "individuals receiving services from St. Camillus" or "individuals receiving services" refers collectively to skilled nursing facility residents, adult day health program registrants, waiver program participants, home care patients, diagnostic and treatment facility patients, and other individuals who receive services, have received services, or seek services in the licensed facilities and programs operated by St. Camillus.

To Individuals Receiving Services from St. Camillus

1. All Covered Individuals will support St. Camillus' mission to provide quality health care services that respond to the needs of individuals receiving services from St. Camillus, their families, as well as the community as a whole. The care provided must be reasonable and necessary to the health and welfare needs of each individual receiving services, as appropriate to the situation, and shall be provided by properly qualified individuals. All care must be properly documented as required by law, regulation, professional standards, and the applicable St. Camillus policies and procedures.

2. St. Camillus is committed to providing care to individuals receiving services without regard to such person's age, race, gender, color, religion, national origin, disability, sexual orientation, marital status, or covered veteran status. All Covered Individuals shall support the legal and ethical rights of individuals receiving services.

3. Covered Individuals shall maintain the privacy of individuals receiving services and the confidentiality of their personal information (including medical information) in accordance with the applicable legal and ethical standards. Covered Individuals shall not reveal personal or confidential information of an individual receiving services except for legitimate business or patient care purposes, and then only consistent with applicable law, policies and procedures.

4. A Covered Individual may never ask for or accept any money, tip, gratuity, or personal gift in any form (or on behalf of) an individual receiving services, regardless of the perceived monetary value. For example, an employee may not accept any gift intended for his or her personal use or benefit (whether money, material object, or food/beverage item) from a family member of an individual receiving services. If offered such a gift, the Covered Individual should courteously explain St. Camillus' policy and try to redirect the gesture to an acceptable form of appreciation that does not create compliance concerns, such as a donation to the department, St. Camillus Foundation, or a letter of appreciation to a supervisor or administration. Under extenuating circumstances, if this is not possible and the personal gift cannot be declined without causing undue discomfort to the person who offered it,

the personal gift should be immediately turned over to the supervisor or Corporate Compliance Officer for proper follow up. Any questions regarding the management of specific scenarios are to be referred to the Compliance Officer or the Compliance Officer's designee.

To Our Community

5. One of St. Camillus' strongest assets is its reputation for integrity and honesty. St. Camillus operates on the fundamental principle of full compliance with applicable laws and ethical standards. Achieving business results through illegal acts or unethical conduct violates the Code and is therefore prohibited. All Covered Individuals shall comply with this principle in relation to their jobs and/or duties to St. Camillus, individuals receiving services, families, and fellow employees.

6. St. Camillus is committed to avoiding even the appearance of impropriety or conflict of interest in its business operations. Therefore:

(a) A Covered Individual may never offer, solicit, give, or accept gifts, money, favors, services, meals, entertainment or other things of value under circumstances where they may influence or appear to influence decision-making or actions affecting St. Camillus. As one example: an employee may never accept any payment, rebate, gift, or other thing of value from a vendor or a prospective vendor in connection with the purchase or acquisition of goods or services for St. Camillus. Occasional refreshments of modest value may be accepted in a business meeting that is attended only by bona fide meeting participants, if the consumption of refreshments is subordinate in time and focus to the legitimate business purpose of the meeting, and if the setting of the meeting is conducive to business discussion.

(b) Charitable donations to St. Camillus may only be solicited, made, received, and used for St. Camillus' bona fide charitable purposes, in full compliance with all laws and regulations applicable to tax-exempt charitable organizations.

(c) A Covered Individual shall not have a financial or other personal interest, other than fair market value compensation for goods or services, in any transaction to which St. Camillus is a party. All transactions between St. Camillus and Covered Individuals shall be at arms length and in compliance with all applicable laws and policies.

7. St. Camillus is a tax-exempt charitable organization. Therefore, its assets and resources must be used exclusively in furtherance of its charitable purposes. The use of any such assets or resources for private benefit or gain is strictly prohibited.

8. St. Camillus' business transactions shall be carried out in accordance with management's general and specific directives. St. Camillus' books and records shall be kept in accordance with generally accepted accounting and other standards. All transactions, payments, receipts, accounts, and assets shall be completely and accurately recorded on St. Camillus' books on a consistent basis. No payment shall be approved or

made with the intention or understanding that it will be used for any purpose other than as described in the supporting documentation. No information shall be recorded or submitted to other persons with the intent to mislead or to conceal impropriety.

9. Books and records shall be created, maintained, retained, and destroyed only in accordance with St. Camillus' records management policies.

10. Covered Individuals shall comply with applicable federal and state antitrust laws. There shall be no unlawful discussions or agreements with competitors regarding price or other terms for services, prices paid to suppliers or providers, dividing up customers or geographic markets, or joint action to boycott or coerce certain customers, suppliers or providers.

11. Neither St. Camillus nor any Covered Individual shall engage in unfair competition or deceptive trade practices, including misrepresentation of St. Camillus' services or operations. Covered Individuals shall not make false or disparaging statements about competitors or their products or attempt to coerce suppliers or providers into purchasing St. Camillus' services.

12. Covered Individuals shall not seek to improperly obtain or misuse confidential information of St. Camillus' competitors.

To The Taxpayers

13. St. Camillus is committed to the highest ethical standards with regard to its dealings with governmental officials. Therefore:

(a) Covered Individuals shall not directly or indirectly authorize, pay, promise, deliver or solicit any payment gratuity or favor for the purpose of influencing any government official or government employee in the discharge of that person's responsibilities.

(b) Covered Individuals shall not entertain government personnel in connection with St. Camillus' business, except as permitted by law.

(c) All political activities relating to St. Camillus shall be conducted in full compliance with applicable law. None of St. Camillus' funds or property shall be used for any political campaign contribution or purpose. Covered Individuals may make direct contributions of their own money to political candidates and activities, but such contributions and expenses related to such activities shall not be reimbursed by St. Camillus.

(d) Covered Individuals shall be completely honest in all dealings with government agencies and representatives. No misrepresentations shall be made and no false bills or requests for payment or other documents shall be submitted to government agencies or representatives.

(e) Covered Individuals shall cooperate fully and promptly with appropriate governmental and regulatory investigations in accordance with St. Camillus' applicable policies and procedures.

To St. Camillus

14. Covered Individuals shall maintain the confidentiality of St. Camillus' business information, as well as information related to St. Camillus' relationships with vendors, suppliers, providers, and those who purchase St. Camillus' services. Covered Individuals may only use such confidential or proprietary information in furtherance of St. Camillus' interests.

15. A Covered Individual shall not engage in any financial, business or other activity that competes with St. Camillus' business if such activity interferes, could potentially interfere, or has the appearance of interfering with the performance of the individual's duties.

16. St. Camillus property, facilities, and resources shall only be used in furtherance of St. Camillus business and in compliance with St. Camillus policies and procedures.

To Our Employees

17. St. Camillus is committed to providing appropriate training and guidance for Covered Individuals with regard to the Code and the Compliance Program. Every supervisor and manager must ensure that all Covered Individuals within their supervision are trained to act in compliance with all applicable laws and ethical standards, as well as this Code and the applicable policies and procedures. All Covered Individuals are responsible for acquiring sufficient knowledge to recognize potential compliance issues applicable to their duties and for appropriately seeking advice and guidance regarding such issues.

18. Covered Individuals, particularly employees, shall follow safe work practices and shall comply with all applicable safety standards and health regulations.

19. Covered Individuals, especially employees, are responsible for conducting themselves such that St. Camillus' work environment is free of discrimination or harassment due to age, race, gender, color, religion, national origin, disability, sexual orientation, or covered veteran status. Any form of sexual harassment, including creating a hostile work environment, is completely prohibited.

20. Covered Individuals are required to report known or suspected violations of law, the Code, or any policy or procedure of St. Camillus, in accordance with the Reporting Protocol. No Covered Individual shall be subject to any retaliation for reports made in good faith. Failure to report when required by the Reporting Protocol may subject the Covered Individual to sanctions.