



COMPLIANCE PROGRAM PLAN AND POLICIES

This document provides a summary of the St. Camillus Compliance Program. This website version may be updated periodically and superseded by subsequently approved versions of St. Camillus Compliance Program documents. Additional compliance policies, procedures, and operational protocols are maintained internally and are available to affected individuals as appropriate. The Compliance Program is available to employees, residents, families, contractors, vendors, volunteers, and members of the public.

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COMPLIANCE PLAN

St. Camillus is committed to conducting its operations in compliance with applicable federal and state laws, regulations, ethical standards, and program requirements. The Compliance Program is designed to promote a culture of integrity, accountability, quality, and responsible stewardship throughout the organization. The program supports the prevention, detection, reporting, investigation, and correction of potential compliance concerns, including fraud, waste, abuse, privacy and security issues, quality-of-care concerns, and other regulatory or ethical matters.

The Compliance Program applies to employees, Board members, contractors, vendors, volunteers, and others who provide services on behalf of St. Camillus. Individuals associated with the organization are expected to understand and follow applicable laws, organizational policies, and the St. Camillus Code of Conduct, and to report concerns through established compliance reporting channels. St. Camillus promotes open communication and encourages individuals to raise concerns or seek guidance whenever questions arise.

Key elements of the Compliance Program include:

- Written policies and procedures;
- A Code of Conduct that establishes expectations for ethical behavior;
- Oversight by the Compliance Officer, Compliance Committee, and Board of Trustees;
- Compliance education and training;
- Reporting and investigation of compliance concerns;
- Auditing, monitoring, and risk assessment activities;
- Corrective action and accountability measures;
- Non-retaliation and whistleblower protections; and
- Ongoing review and improvement of compliance processes.

St. Camillus regularly evaluates its Compliance Program to identify emerging risks, strengthen internal controls, enhance organizational effectiveness, and support continued compliance with legal and regulatory requirements. Through these efforts, St. Camillus seeks to maintain the trust of residents, patients, families, employees, business partners, governmental agencies, and the communities it serves.

CODE OF CONDUCT

The St. Camillus Code of Conduct establishes the ethical principles and standards of behavior that guide the actions and decisions of individuals acting on behalf of the organization. The Code reflects St. Camillus' commitment to integrity, accountability, respect, quality care, and compliance with applicable laws and regulations. It serves as a

foundation for maintaining an organizational culture that promotes ethical conduct and responsible decision-making.

Employees, Board members, contractors, volunteers, vendors, and others associated with St. Camillus are expected to conduct themselves in a manner consistent with the organization's mission, values, policies, and legal obligations. Individuals are responsible for acting honestly, exercising sound judgment, treating others with dignity and respect, and supporting a workplace and care environment that promotes professionalism, fairness, and accountability.

The Code of Conduct includes expectations related to:

- Compliance with applicable laws, regulations, policies, and professional standards;
- Reporting suspected compliance, ethical, quality-of-care, privacy, safety, or regulatory concerns;
- Cooperation with audits, reviews, and investigations;
- Prevention of fraud, waste, abuse, and other improper conduct;
- Avoidance and disclosure of conflicts of interest;
- Protection of confidential, proprietary, and personal information;
- Respectful treatment of residents, patients, families, employees, and other stakeholders;
- Accurate documentation, recordkeeping, and billing practices;
- Responsible stewardship of organizational assets and resources;
- Equal opportunity, nondiscrimination, and workplace professionalism; and
- Ethical interactions with governmental agencies, contractors, vendors, business partners, and other external organizations.

St. Camillus encourages individuals to seek guidance whenever questions arise regarding ethical or compliance-related matters. Concerns may be reported through established compliance reporting channels, and individuals who raise concerns in good faith are protected from retaliation. Through adherence to the Code of Conduct, St. Camillus strives to maintain the highest standards of integrity, quality, and public trust in all aspects of its operations and services.

COMPLIANCE OFFICER & COMPLIANCE COMMITTEE RESPONSIBILITIES

St. Camillus has a Board-designated Corporate Compliance Officer (CCO) who is responsible for the oversight and implementation of the Corporate Compliance Program. The CCO is assisted in these efforts by a Corporate Compliance Committee (CCC) to ensure that St. Camillus is conducting its business in an ethical and responsible manner, consistent with its Compliance Program. Members of the CCC have broad backgrounds, experience levels, and expertise in operations, monitoring quality, service delivery, and legal/regulatory compliance. Membership on the CCC includes but is not limited to the CCO who serves as

the Chair of the Committee, the President / CEO of St. Camillus, Vice President of Finance (CFO), and such other senior leadership and key staff members as the President / CEO may appoint to the Committee from time to time. The Compliance Committee operates pursuant to a formal Charter approved by organizational leadership and/or the Board of Trustees. The Charter establishes the Committee's purpose, authority, responsibilities, and governance structure and is maintained as part of St. Camillus' internal compliance program documentation.

PURPOSE: The St. Camillus Board of Trustees (the “Board”) adopted a Code of Conduct for the organization and directed that a Corporate Compliance Program be established for the purpose of pursuing and supporting the ideals of the Code of Conduct. The Board further appointed a CCO to be responsible for this Program and directed that a CCC be established to support the CCO.

REPORTING AND INVESTIGATION OF COMPLIANCE CONCERNS

St. Camillus is committed to maintaining a culture of integrity, accountability, and compliance. Individuals are encouraged to report any concern involving potential violations of laws, regulations, organizational policies, the Code of Conduct, quality of care standards, privacy requirements, or other suspected improper conduct.

Reports may be made by employees, residents, family members, volunteers, contractors, vendors, business partners, or any other affected individual. Concerns may be reported through a supervisor, department manager, the Compliance Officer, the Compliance Hotline, or any other available reporting mechanism. Reports may be made anonymously where permitted by law.

St. Camillus maintains a strict non-retaliation policy. No individual who reports a concern in good faith, participates in an investigation, or cooperates in compliance activities will be subject to retaliation, intimidation, harassment, discrimination, or other adverse action.

All reported concerns are reviewed and assessed promptly. The Compliance Officer, or designee, is responsible for coordinating appropriate follow-up and determining whether further review or investigation is necessary. Investigations are conducted in a manner that is objective, thorough, and consistent with applicable laws, regulations, and organizational policies.

To the extent practical and permitted by law, information related to reports and investigations will be handled confidentially. Information will be shared only with those

individuals who have a legitimate need to know in order to review, investigate, resolve, or respond to the matter.

When concerns are substantiated, St. Camillus will take appropriate corrective action, which may include process improvements, additional education and training, disciplinary action, repayment of identified overpayments, policy revisions, self-disclosure to appropriate authorities, or other measures necessary to address the issue and prevent recurrence.

Individuals are encouraged to report concerns as soon as possible so that potential issues may be addressed promptly and appropriate corrective action may be taken when necessary.

COMPLIANCE EDUCATION AND TRAINING

St. Camillus maintains a compliance education and training program as required by its Compliance Program and applicable laws and regulations. Education and training may be provided, as appropriate, to employees, Board members, contractors, volunteers, vendors, and other affected individuals whose responsibilities relate to organizational operations and compliance activities.

Training is designed to promote understanding of applicable laws, regulations, organizational policies, ethical standards, and reporting obligations. Through ongoing education and training, St. Camillus reinforces its commitment to compliance, integrity, accountability, and the prevention, detection, and reporting of potential compliance concerns.

CONFLICTS OF INTEREST

St. Camillus is committed to conducting its business with integrity and in the best interests of the individuals and communities it serves. Employees, Board members, contractors, and others acting on behalf of the organization are expected to avoid situations in which personal, financial, or other interests could improperly influence, or appear to influence, their professional judgment or decision-making.

Individuals are required to disclose actual, potential, or perceived conflicts of interest in accordance with organizational policies. Reported conflicts are reviewed and addressed through appropriate management and governance processes to ensure that decisions are made objectively and in the best interests of St. Camillus and those it serves.

St. Camillus is committed to transparency, ethical conduct, and compliance with all applicable laws, regulations, and organizational standards related to conflicts of interest.

IDENTITY THEFT PREVENTION PROGRAM

St. Camillus is committed to protecting the personal, financial, and health information of residents, patients, employees, and other individuals served by the organization.

As part of this commitment, St. Camillus maintains an Identity Theft Prevention Program designed to identify, detect, prevent, and respond to potential incidents of identity theft and fraud. The program includes safeguards to protect sensitive information, employee education and awareness efforts, and procedures for addressing suspected incidents in a timely and appropriate manner.

Employees and individuals associated with St. Camillus are expected to support the protection of confidential information and to report suspected identity theft, unauthorized use of information, or related concerns through established reporting channels.

St. Camillus regularly evaluates its identity theft prevention efforts and implements measures necessary to support compliance with applicable laws, regulations, and industry best practices.

EXCLUSION SCREENING

St. Camillus maintains an exclusion screening program designed to ensure compliance with federal and state requirements regarding excluded individuals and entities. The organization does not employ, contract with, or otherwise engage individuals or entities excluded from participation in federally funded healthcare programs. Screening activities are conducted in accordance with applicable legal and regulatory requirements, and identified concerns are addressed promptly and appropriately.

CONTRACTING AND VENDOR OVERSIGHT

St. Camillus is committed to conducting business with vendors, contractors, consultants, and other business partners who share the organization's commitment to integrity, ethical conduct, quality services, and compliance with applicable laws and regulations.

St. Camillus maintains processes to evaluate and monitor vendor and contractor relationships, including appropriate due diligence activities designed to identify potential compliance, operational, financial, and reputational risks. Vendors and contractors are

expected to comply with applicable legal, regulatory, contractual, and ethical requirements when providing goods or services on behalf of the organization.

Concerns regarding vendor or contractor conduct may be reported through established compliance reporting channels. When appropriate, St. Camillus will take corrective action to address identified issues and to protect the interests of the organization, its residents, patients, employees, and other stakeholders.

ANNUAL INDEPENDENCE STATEMENT

St. Camillus promotes strong governance through an annual review of Trustee independence. The process is intended to support objective oversight, informed decision-making, and compliance with applicable governance and reporting requirements.

Trustees are expected to exercise independent judgment, fulfill their fiduciary responsibilities, and act in the best interests of the organization and those it serves.

WHISTLEBLOWER POLICY

St. Camillus encourages employees, residents, family members, volunteers, contractors, vendors, and other affected individuals to report suspected misconduct, fraud, waste, abuse, quality-of-care concerns, privacy concerns, or other compliance issues.

Reports may be made to a supervisor, manager, the Compliance Officer, or through the Compliance Hotline. Reports may also be made anonymously where permitted by law.

St. Camillus strictly prohibits retaliation against anyone who, in good faith, reports a concern, seeks guidance, or participates in a compliance review or investigation.

All reported concerns are reviewed and addressed appropriately. To the extent practical and permitted by law, information related to reports will be handled confidentially. St. Camillus is committed to fostering an environment where individuals can raise concerns without fear of retaliation and with confidence that concerns will be taken seriously.

Corporate Compliance Officer contact information:

Compliance Officer
813 Fay Road
Syracuse, New York 13219
(315) 488-2951 or

POLICY DEVELOPMENT AND MAINTENANCE

St. Camillus maintains written policies and procedures designed to promote ethical conduct and compliance with applicable federal and state laws, regulations, and organizational standards. Compliance-related policies are reviewed at least annually and revised as appropriate to reflect changes in legal requirements, operational practices, industry guidance, and identified risk areas. Through this ongoing review process, St. Camillus seeks to ensure that its policies remain current, effective, and aligned with the organization's Compliance Program.

NON-RETALIATION AND NON-INTIMIDATION

St. Camillus encourages individuals to raise concerns regarding potential compliance, legal, ethical, quality-of-care, privacy, safety, or other organizational issues without fear of retaliation.

Retaliation, intimidation, harassment, discrimination, coercion, or other adverse action against any individual who, in good faith, reports a concern, seeks guidance, participates in an investigation, or cooperates in compliance activities is strictly prohibited.

Individuals who believe they have experienced retaliation or intimidation are encouraged to report their concerns through established reporting channels. St. Camillus is committed to maintaining a culture of integrity, transparency, and accountability where concerns can be raised and addressed appropriately.

DISCIPLINE & ENFORCEMENT OF COMPLIANCE STANDARDS

Compliance with applicable laws, regulations, organizational policies, and the St. Camillus Code of Conduct is expected of all individuals associated with the organization.

Violations of compliance requirements may result in appropriate corrective or disciplinary action, up to and including termination of employment, contract, appointment, or other affiliation, as applicable.

St. Camillus applies compliance standards consistently and promotes accountability at all levels of the organization. Individuals who engage in misconduct, fail to report known violations, interfere with compliance activities, or retaliate against individuals who report concerns in good faith may be subject to corrective or disciplinary action.

AUDITING AND MONITORING

St. Camillus conducts auditing and monitoring activities to assess compliance with applicable laws, regulations, organizational policies, and ethical standards. These activities help identify potential risks, evaluate the effectiveness of compliance efforts, and support continuous improvement throughout the organization.

When potential issues are identified, St. Camillus takes appropriate steps to review concerns, implement corrective actions as needed, and strengthen compliance processes.

GOVERNMENT AUDITS, INVESTIGATIONS AND SEARCH WARRANTS

St. Camillus maintains policies governing responses to government audits, investigations, subpoenas, and search warrants. Such operational procedures are maintained internally and are available to affected individuals as appropriate.

ANTIKICKBACK

St. Camillus is committed to complying with all applicable federal and state Anti-Kickback laws and regulations. The organization prohibits the offering, soliciting, payment, or acceptance of improper compensation, gifts, incentives, or anything of value intended to influence referrals, business decisions, or healthcare services.

Employees, contractors, vendors, and others acting on behalf of St. Camillus are expected to conduct business ethically and in compliance with applicable laws. Suspected violations may be reported through established compliance reporting channels.