

CODE OF CONDUCT

HILLCREST

Code of Conduct

Hillcrest is a Continuing Care Retirement Community licensed under the laws of California to provide services to individuals living in our community.

As a part of our team, you must follow our Compliance and Ethics Program and the Code of Conduct. Our team includes individuals who provide care and services throughout the organization as well as those who support our work through contracts and other agreements. Senior living communities like ours must follow many rules and regulations from both the state and federal governments. This Code of Conduct will help you understand how your actions must align with this wide range of rules as a team. We can ensure that we provide the highest level of care and services and prevent fraud, waste, and abuse.

Our Compliance Officer is Karla Dreisbach. The Compliance Official at Hillcrest is Andrea Lopez.



Dear Associates,

We have a long tradition of providing healthcare services to older adults in a way that demonstrates love and compassion. We strive to follow our heritage of ethical and moral decision making in the care we provide. This heritage enables us to share our values with the residents we serve.

The healthcare industry is constantly changing and being impacted by numerous laws and regulations. In our desire to establish a workplace that complies with these laws and regulations, we have developed a Compliance and Ethics Program that supports our Associates in making the right decisions. This document, called the Code of Conduct, represents the primary focus for our Compliance and Ethics Program. The Code of Conduct not only reflects our heritage and values but also serves as a bold statement that influences how we enhance a resident's quality of life.

The Compliance Plan, Policies and Procedures and the Code of Conduct exist to ensure that our decisions are both ethical and compliant with applicable laws, statutes, and regulations. Our Code of Conduct does not replace each person's obligation to make wise, fair, and honest decisions. It is intended to explain our personal and organizational responsibility and to reflect those areas in which improper or unwise decisions can harm our organization.

We value your contribution to the residents and appreciate your support in properly maintaining the most ethical workplace possible. We commend you for your commitment to honesty and integrity, which are also part of our values. As part of our team, you are responsible for helping to protect our work environment and its compliance with laws and regulations.

Thank you for your commitment and contribution to our mission, values, and, most importantly, to our residents.

Sincerely,

Joel Brouwer
President/CEO (Interim)

Introduction

Our **Code of Conduct** is a guide to appropriate workplace behavior. Refer to this guide whenever you are unsure of how to make the right decision(s) or how to respond to a situation. Associates and individuals all share a commitment to legal, ethical, and professional conduct in the workplace. This Code of Conduct is one of three documents that guide our work. For more detailed information, you can read the **Compliance Plan** and the **Compliance Policies and Procedures**. The Compliance Plan and Code of Conduct include the federal, state, and local laws we must follow.

Our Responsibilities

As part of our team, we each share a responsibility and commitment to our residents, their families and each other.

As part of your commitment to our team, it's important that you always make legal and ethical decisions. Additionally, if you see anyone else on the team violating the Code of Conduct, it's your responsibility to report those violations to the compliance officer. Reporting violations of the Code of Conduct is not optional. **You must report anything you see that may be unethical, illegal, or unprofessional.** Our reporting process includes several ways for you to share any concerns you may identify.

The Reporting Process

You may always call the Compliance Line at 800-211-2713 or file a report at Hillcrest.

- Report to a supervisor. They are most familiar with the regulations and policies that relate to your work.
- Report to a member of the leadership team.
- Report to Human Resources.
- Contact the Compliance Official or the Compliance Officer.
- Call the toll-free compliance line which is available 24/7.
- Scan the QR code which links to the Compliance Line portal.

Compliance Hotline: 800-211-2713

All reports to the Compliance Line are confidential, and you may choose to report *ANONYMOUSLY*.

The Compliance Line is available 24 hours a day, 7 days a week, for callers to report compliance-related issues. Concerns that are reported to the Compliance Line are taken seriously. Our culture is to ensure that there is no retaliation for bringing issues forward.

You can make calls to the Compliance Line without fear of reprisal, retaliation, or punishment for your actions taken in good faith. Anyone, including a supervisor, who retaliates against an individual or entity for contacting the Compliance Line or reporting a compliance issue in any other manner will be disciplined.

Resident-Centered Care & Rights

The **foundation for good quality of care and quality of life** is understanding and honoring resident rights. As we provide care, it is important to respect residents' rights. This includes:

- Always treating residents equally and in respectful ways, preserving their dignity, autonomy, self-esteem, and civil rights.
- Protecting resident privacy and confidentiality, particularly regarding medical, financial, or personal information as required by HIPAA.
- Respecting and protecting the personal property and money of all residents from loss, theft, improper use, and damage.
- Ensuring that residents and their legal representatives understand and participate in decisions about their care and treatment.
- Providing the individual needs of our residents and developing care plans based upon their assessed needs.
- Monitoring our services to ensure that our residents receive quality services through Quality Assurance and QAPI.
- Assuring that our staff is qualified with appropriate licenses and experience.

- Maintaining our policies, procedures, and practices are current and in line with the rules and laws we need to follow.

- Completing accurate and timely documentation and billing for services provided.

- Protecting every resident from physical, emotional, verbal, sexual or mental abuse or neglect. Any Associate who abuses or neglects a resident can be terminated.

As a MANDATED REPORTER,
if you witness any form of abuse, you must report it immediately to your supervisor

Hillcrest will not tolerate any type of resident abuse or neglect at any time.

Professional Responsibilities

As an employer, we promise to follow **fair employment practices** when hiring, screening, and evaluating our Associates. Federal, state, and local laws guide our employment practices and provide us with a roadmap to compliance.

To keep residents safe, we screen all Associates against various databases as required by law. As long as you work here, you must immediately tell your supervisor if any of your actions inside or outside of work might affect your employment. You must report any arrests or indictments, convictions, revocation of professional licenses, exclusions, or anything else that might prevent you from working at a healthcare organization.

The professional, responsible, and ethical behavior of every Associate reflects directly on our reputation. As an Associate, you must strive to make decisions that are honest and professional every day.

If you are an Associate with a **professional license**, it's your responsibility to ensure you follow all applicable licensing, credentialing, and certification requirements and keep it current and in good standing.

We will not tolerate any form of **sexual harassment or violence** in the workplace. Additionally, Associates may not supervise or be supervised by anyone with whom they have a close personal relationship.

You must follow our safety protocols, in place to protect you and the residents. These include, but are not limited to, our emergency plans, hazardous materials, and

environmental policies. Let your supervisor know of any potential hazards immediately.

Safety in the workplace includes refraining from using any substances that impair your ability to do your job. You may never use, sell, or bring alcohol, illegal drugs, and/or narcotics on our property. You may never come to work under the influence of alcohol or illegal drugs. We have the right to screen and discipline any Associate suspected of violating the drug and alcohol policy. Hillcrest is a smoke- and vape-free environment in all areas of campus.

Governance & Oversight

We are committed to ensuring our organization remains in compliance with all applicable federal and state laws. As an Associate, you must also help our organization always remain in good standing regarding our business practices.

During the course of your job, you may have access to confidential and proprietary information. **Proprietary information** is any information an organization creates or owns, such as policies and procedures, compensation, or marketing and advertising plans. Confidential or proprietary information should not be shared with anyone outside Hillcrest without prior permission.

Associates may not accept any **tips, gratuity, or gifts** from residents, possible residents or their family. Likewise, you may not give residents gifts. Gifts include any business or professional courtesy, including entertainment. Perishable or consumable gifts from family members and friends may be accepted by a department or group so long as the gifts are not designated for a specific Associate.

Associates must always avoid **conflicts of interest**. A conflict of interest is when your personal interests may interfere with your ability to make good decisions for Hillcrest. If you are unsure if a situation or relationship is a conflict of interest, talk with your supervisor.

Throughout the course of your job, you may use our **computers systems and networks**. You have **no expectation of privacy** while using our computers systems and using them improperly or illegally is a violation of the Code of Conduct. When using your

work computer to create documents, records, emails, medical records, billing records, and financial records, Associates must never falsify or alter any document in an illegal or unethical way.

We use **marketing and advertising** to educate the public about our community services, activities, and opportunities. All marketing and advertising materials are truthful and informative and are designed to be honest and accurate. Associates and individuals often have **relationships** with other healthcare providers and referral sources. All relationships with these professionals must be open, honest, and legal.

We are required to follow many federal, state, and local laws, often subject to change. Management will communicate about these changes when they occur and educate Associates and individuals as needed. It's your job to read these **updates** so you always have the most up-to-date information.

We are committed to **ethical and honest billing practices**. All Associates must make truthful, accurate, and complete statements and submissions for billing. We have zero tolerance for false or inaccurate coding or billing. Any Associate who knowingly submits a false claim or provides information that could result in a false claim may be disciplined up to and include termination. Additionally, if you witness or suspect another Associate or individual member of making false billing claims, you must report the activity to your supervisor or the compliance officer/designee.

We will take **disciplinary action** against an Associate who violates this Code of Conduct, the Compliance and Ethics Program, the supporting policies and procedures, and applicable federal, state, and local laws. Disciplinary action could come in the form of termination of employment or business relationships, civil penalties, and/or criminal investigation. We may also initiate disciplinary action against any Associate who **retaliates** against another Associate following the Code of Conduct and applicable laws.

Conclusion

You are valued here. We trust you to always make ethical and honest decisions during your employment here. If ever you have a question about compliance or ethics in your decision making, please discuss the issue with your immediate supervisor or our compliance officer.

The Compliance and Ethics Program is critical to our continued success. The Code of Conduct and the Compliance and Ethics Program set standards for our legal, professional, and ethical conduct. Some key points to remember are:

- We are committed to personal and organizational integrity, acting in good faith, and being accountable for our actions.
- The Code of Conduct and the Compliance and Ethics Program prepare us to deal with the growing complexity of the ethical, professional, and legal requirements governing healthcare in the CCRC environment.
- 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 Associates.

The success of the Compliance Program depends on our commitment to act with integrity, both personally and as an organization. As an Associate, your duty is to ensure that you are doing everything practically 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.

Your Compliance Official
Andrea Lopez, MSG, RCFE, CPASRM
(909) 392-4313

Your Compliance Officer
Karla Dreisbach, CHC, CHPC, CCEP
AQORD Compliance Collaborative
(215) 646-0720