



CODE OF CONDUCT ACKNOWLEDGEMENT

As part of Liberty’s corporate Compliance Program all Liberty employees and subcontractors of (“Liberty’s Workforce”) are expected to abide by all applicable laws and regulations, contracts, and internal policies and procedures. The following is summary of Liberty’s Code of Conduct. Please review the attached Code.

1. Liberty complies with all applicable laws and regulations.
2. Liberty conducts its affairs in accordance with the highest ethical standards.
3. All Liberty Workforce members must support its goal of providing quality health care services.
4. All members of the Liberty Workforce shall avoid conflicts of interest.
5. Liberty strives to attain the highest standards for all aspects of client care.
6. Liberty provides equal opportunity and respects the dignity of its Workforce.
7. Liberty promotes integrity by conducting reference and sanction checks on all Workforce members.
8. Liberty maintains appropriate confidentiality for the information and documentation entrusted to it.
9. Liberty maintains a relationship of integrity with each payor source.
10. Liberty and all members of the Liberty Workforce shall conduct all business practices with honesty and integrity.
11. Liberty promotes safety in every setting in services are provided.
12. The Compliance Program, including the Code of Conduct, are essential to Liberty’s operations and activities.
13. The Compliance Program, including the Code of Conduct, apply to all of Liberty’s Workforce.
14. The Compliance Program includes an integrated Fraud, Waste, and Abuse (FWA) plan to promote the prevention, detection, and reporting of all categories of FWA.
15. Liberty provides a Drug-Free workplace.

All the basic information on the Liberty Compliance Program can be found on UKG. There are many ways you can and should report suspected violations of law, contract, or policy.

- You can report it to the Chief Compliance Officer: John Beck by phone (610) 668-8800, ext 405, email john.beck@libertyhealth.com or mail it him at the Corporate office in Bala Cynwyd;
- You can email Corporatecompliance@libertyhealth.com
- You can call the Employee HelpLine at (800) 653-7174; or
- You can report the issue using the Corporate Compliance Incidents/Issues Form on UKG.

Unethical and illegal conduct damages our company and community. Therefore, any person found to have violated any obligations under this Code or the Compliance Program will be subject to discipline, up to and including dismissal/termination. We believe that every member of the Liberty family shares these goals and responsibilities, and together we can continue to build an organization true to the ideals upon which Liberty was founded.

After reviewing Liberty’s Code – please answer BOTH of the following two (2) questions:

1. Since I started at Liberty or since I last completed this form (whichever is later), none of my work-related licenses or credentials has been revoked, suspended, limited or modified in any way.
 TRUE NOT APPLICABLE FALSE– Please explain: _____
2. Since I started at Liberty, or since I last completed this form (whichever is later), there has been no change in my criminal record, including arrests, charges, or convictions.
 TRUE FALSE – Please explain: _____

By signing below, I acknowledge and agree that I have read the above and the Code of Conduct and agree to comply with it.

Employee/Subcontractor Printed Name

Signature

Date

****Upon Completion, please e-mail form to Abby.Yankawitz@libertyhealth.com or e-fax form to 610-617-3794****



Standard Operating Policies – SOP #2 Code of Conduct

Title:	Code of Conduct	Effective Date:	12/01/2003
Author:	Chief Compliance Officer	Last Review Date:	12/01/2021
Location:	All Locations	Last Revision Date:	12/01/2021
Functional Area:	ADMINISTRATION		

POLICY

As Liberty performs its services, various laws of the United States, and other applicable state and local laws govern its operations. Compliance with laws has been and will always be an integral part of Liberty's operations. In the performance of their respective duties, all Liberty's employees and subcontracted workforce (collectively "Liberty's Workforce") are expected to adhere to the Code of Conduct. Liberty's corporate compliance program (Program) and Code of Conduct provides the guiding standards for our decisions and actions. This policy is intended to provide reasonable assurance that Liberty's Workforce:

- Comply in all material respects with all federal, state and local laws and regulations that are applicable to its operations;
- Satisfy the conditions of participation in health care programs funded by the state and federal government and the terms of its other contractual arrangements;
- Detect and deter criminal conduct or other forms of misconduct by trustees, officers, employees, staff, agents and contractors that might expose Liberty to significant civil liability;
- Promote self-auditing and self-policing, and provide for, in appropriate circumstances, voluntary disclosure of violations of laws and regulations; and
- Establish, monitor, and enforce high professional and ethical standards.

PROCEDURE

1. **Liberty complies with all applicable laws and regulations.**

Unethical and illegal conduct damages Liberty, its clients and the community. Therefore, any Liberty Workforce member found to have violated any of his or her obligations under this Code of Conduct or the compliance program will be subject to discipline, up to and including dismissal from employment. We expect every member of the Liberty Workforce to demonstrate a fundamental commitment to abide by federal and state laws in the performance of his/her duties and responsibilities, and together we can continue to uphold an organization true to the ideals upon which it was founded. The Code of Conduct sets forth fundamental principles. Although the Code of Conduct can neither cover every situation in the daily conduct of Liberty's many varied activities, nor substitute for common sense, individual judgment or personal integrity, it is the duty of each member of the Liberty Workforce to adhere, without exception, to the following guiding principles:

- It is the duty of Liberty and each member of the Liberty Workforce to uphold all applicable laws and regulations. All Liberty Workforce members must be aware of the legal requirements and restrictions applicable to their respective positions and duties. Liberty expects each of its Workforce members to refrain from engaging in any activity which may violate any laws or regulations.
- Liberty's Code of Conduct will be distributed yearly and acknowledged and signed by Liberty's Workforce to confirm their review and acknowledgement that they are unaware of any known or suspected violation(s) of any applicable law or regulation or policy. If a Workforce member is aware of any known or suspected

violation(s) he/she will report the identified violation(s) to the traditional chain of command, directly to the CCO or to the Employee Help Line.

- Liberty shall use training and programs that promote greater awareness of potential or actual violations and will monitor and promote compliance with applicable laws and regulations.

Any questions about the legality or propriety of any actions undertaken by or on behalf of Liberty should be reported immediately to the traditional chain of command, directly to the CCO or to the Employee Help Line at 1-800-653-7174. The Help Line is a 24-hour/365-day confidential service operated by risk management professionals for the sole purpose of identifying and processing corporate compliance questions and issues.

2. Liberty conducts its affairs in accordance with the highest ethical standards.

Liberty and all of its Liberty Workforce shall conduct all activities in accordance with the highest ethical standards of the community and their respective professions at all times and in a manner, which shall uphold Liberty's reputation and standing. No member of the Liberty organization shall make false or misleading statements to any patient, client, consumer, resident, person or entity doing business with Liberty.

3. All Liberty Workforce members must support its goal of providing quality health care services.

Liberty is dedicated to the provision of health care. All Liberty Workforce members must faithfully conduct their assigned roles, tasks and duties for the purpose, benefit and interest of Liberty and the people that Liberty serves.

4. All members of the Liberty Workforce shall avoid conflicts of interest.

All members of the Liberty Workforce have a duty to avoid conflicts with the interests of Liberty and may not use their positions and affiliations with Liberty for personal benefit. Members of the Liberty Workforce must consider and avoid not only actual conflicts of interest, but also the appearance of any conflicts of interest.

5. Liberty strives to attain the highest standards for all aspects of client care.

The care provided by Liberty must be reasonable, necessary, and appropriate to the situation, and must be provided by properly qualified individuals. The delivery of all such care must be appropriately documented as required by applicable laws and regulations, payor requirements and professional standards.

6. Liberty provides equal opportunity and respects the dignity of all its Workforce.

Liberty is committed to providing equal employment opportunities for all persons of its Workforce, without regard to race, color, nationality or ethnic origin, religion, gender, sexual orientation, disability or veteran's status. Liberty provides health care services in many different settings, such as skilled nursing facilities, long term care facilities, jail mental health, corrections, intellectual/developmental disability services, behavioral health centers, home and community based services, geriatric psychiatry and other workplace and community outpatient settings. In every instance, Liberty is committed to providing a workplace environment which respects the dignity of each person in the site. Therefore, discrimination, sexual harassment and any other violation of the rights and dignity of people in any form or context will not be tolerated.

7. Liberty promotes integrity by conducting reference and sanction checks on all Workforce members.

As part of every employment and Workforce member application and Liberty's competency evaluation review system, Liberty conducts work performance reference checks, sanction checks and criminal checks on all new Workforce members. All Liberty job applications specifically require the applicant to disclose any criminal conviction, as defined by 42 U.S.C. 1320 a-7(I), or exclusion action or debarment.

8. Liberty maintains appropriate confidentiality for the information and documents entrusted to it .

In the course of providing services, Liberty's Workforce may be entrusted with or have access to a variety of sensitive and proprietary information, the confidentiality of which they are obligated to protect. All members of the Liberty Workforce must adhere to the appropriate laws, regulations, policies and procedures necessary to ensure that confidential information is properly maintained and to prevent its inappropriate or unauthorized disclosure or release. All members of the Liberty Workforce shall create and maintain records and documentation in accordance with legal, professional and ethical standards.

9. Liberty maintains a relationship of integrity with each payor source.

All members of the Liberty Workforce shall ensure that all of its requests for payment are for services that are reasonable, necessary and appropriate, are provided by properly qualified persons, and are billed in the correct amount and supported by appropriate documentation.

10. Liberty and all members of the Liberty Workforce shall conduct all business practices with honesty and integrity.

All business practices of Liberty must be conducted with honesty and integrity and in a manner that promotes Liberty's reputation for honest and ethical dealings. All members of the Liberty Workforce must:

- Adhere to proper business practices and federal and state fraud and referral prohibitions in dealing with vendors and referral sources;
- Conduct business transactions free from offers or solicitation of gifts, favors or other improper inducements;
- Conform to all applicable antitrust laws and regulations, and ensure that Liberty does not violate laws and regulations with respect to (i) pricing or other sale terms or conditions; (ii) improper sharing of competitive information; (iii) the allocation of territories; or (iv) the impermissible exclusion of others from economic activities;
- Maintain and protect the property and assets of Liberty, including intellectual property and proprietary information, controlled substances and pharmaceuticals, equipment and supplies, and monetary funds, and refrain from using Liberty's assets for personal gain;
- Maintain the confidentiality of proprietary information belonging to other persons or entities doing business with Liberty; and
- Prepare accurate financial reports, accounting records, research reports, program reports, utilization data reports, expense accounts, time sheets and other documents so that they completely and accurately represent the relevant facts and true nature of all Liberty's health care deliverables and business transactions.

11. Liberty promotes safety in every setting in which services are provided.

Liberty and all members of the Liberty Workforce shall endeavor to ensure a workplace and working environment, which conforms to regulations regarding occupational health and safety.

12. The Program and the Code of Conduct are essential to the operations and activities of the Liberty organization.

- The Program and Code of Conduct benefit Liberty and all members of the Liberty Workforce. These policies are designed to flexibly evolve to incorporate new ideas and methods.
- The principles embodied in the Code of Conduct should be infused into the daily duties and activities of Liberty Workforce personnel. In this way, the Code of Conduct augments, but never limits, other policies and procedures that govern the daily delivery of services.
- It is the duty of each member of the Liberty Workforce to uphold the standards set forth in the Code of Conduct and to report violations using the traditional chain of command, the CCO or the Employee Help Line.
- Officers, managers and supervisors of Liberty have a special duty to adhere to the principles set forth in the Code of Conduct, to educate and support other members of the Liberty organization in their adherence to the Code, to recognize and detect violations of the Code, and to enforce the standards set forth herein.
- It is a violation of the Code of Conduct to take any action in reprisal against anyone who reports, in good faith, suspected violations of the Code of Conduct, applicable laws and regulations, or other Liberty policies and procedures.
- All alleged violations of the Code of Conduct, applicable laws and regulations, or other vital policies and procedures shall be investigated by persons designated by Liberty, and pursuant to procedures established by Liberty.
- Disciplinary action for violations of the Code of Conduct, applicable laws and regulations, and other Liberty policies and procedures will be determined on a case-by-case basis in accordance with Liberty's current disciplinary policies and procedures. Disciplinary actions may include dismissal from employment. Similarly, the relationship of any Workforce member may be subject to termination. Liberty will cooperate with law enforcement authorities in connection with the investigation and prosecution of criminal offenses committed in any Liberty work setting.

13. The Program applies to all of Liberty's Workforce.

Liberty's Workforce are expected to comply with the Program, Code of Conduct and internal policies and procedures, as well as applicable laws, rules and regulations. Noncompliance with any part of the Program may result in termination of the Liberty Workforce member or subcontractor with Liberty or referral for prosecution, if indicated.

All Liberty Workforce members are required to review and sign agreement to the Code of Conduct at the time they begin providing services and annually thereafter. Signature on the form affirms that the individual will:

- Comply with the Liberty Code of Conduct.
- Abide by all policies and procedures in the Program.
- Be familiar with the Program and its purpose.
- Perform their jobs in a manner which demonstrates commitment to compliance with all applicable laws and regulations;
- Report known or suspected compliance issues to the Liberty traditional chain of command, the CCO or his/her designee, or the Employee Help Line and investigate or participate in an investigation to the point of resolution of any alleged violation; and
- Strive to prevent errors and provide suggestions to reduce the likelihood of errors.

14. Fraud, Waste and Abuse ("FWA") Plan

The Program includes an integrated FWA Plan. Liberty desires to prevent, detect and respond all categories of FWA. Liberty does not tolerate FWA by Liberty Workforce members, as well as clients or residents. FWA includes overpayments. Workforce members will ensure that their actions and services do not violate any federal or state law related to FWA. Liberty shall further ensure that all services rendered are medically necessary and consistent with all applicable requirements, policies and procedures.

Certain Key Terms:

- Fraud means an intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him/her or some other person.
- Waste means overutilization of services or other practices that result in unnecessary cost.
- Abuse is a practice that is inconsistent with sound fiscal, business, or medical practices that result in unnecessary costs.
- Overpayment means any funds that a person receives to which the person, after applicable reconciliation, is not entitled. The overpayment could stem from inaccurate reporting, fraud, waste, or abuse.

Liberty is expected to cooperate and comply with this FWA Plan. If FWA is suspected, it shall be reported like any other compliance incident. Reporters shall not be retaliated against if the report is made in good faith.

15. Drug Free Workplace

Liberty is committed to providing its Workforce with a safe workplace and an atmosphere which allows them to protect inventory and other assets placed in their care; Liberty Workforce should not be subject to any safety threats from fellow workers. Drug use or abuse in the workplace is dangerous. Workforce members are expected to be in suitable mental and physical condition while at work, allowing everyone to perform their jobs effectively and safely. While on Liberty or client premises, which may include working hours, lunch, or break time, no Workforce members may use, manufacture, possess, distribute, sell, or be under the influence of alcohol or drugs, legal or illegal, including controlled or uncontrolled substances, unless such use or possession is prescribed by a physician.

Whenever use or abuse of any mood-altering substance (such as alcohol or other drugs) interferes with a safe workplace, appropriate action must be taken. Liberty has no desire to intrude into its Workforce member's personal lives. However, both on- the-job and off-the-job involvement with any mood-altering substances can have an impact on our workplace and on Liberty's ability to achieve its objectives of safety and security. Therefore, you are expected to report to the workplace with no mood-altering substances in your body. While you may make your own lifestyle choices, Liberty cannot accept the risk in the workplace which substance use or abuse may create. The possession, sale, manufacture, or use of mood- altering substances at the workplace, or coming to work under the influence of such substances shall be a violation of safe work practices and will be

subject to disciplinary action, including possible dismissal or termination, unless such use or possession is prescribed by a physician.

Liberty Workforce members shall notify Liberty of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.

Please also see Human Resources Drug Policy and the Alcohol and Drug Policy for Oklahoma workers on UKG.

Liberty offers drug counseling, rehabilitation, and employee assistance programs. Please see UKG Home page or contact Human Resources for more information.

Liberty Healthcare Corporation and all of its affiliated companies (collectively "Liberty") are dedicated to maintaining excellence and integrity in all aspects of its operations and professional and business conduct. Accordingly, Liberty is committed to the application of high ethical standards and compliance with all governing laws and regulations that govern its operations, including both governmental regulations and regulatory agencies' standards and policies. This commitment is true not only in the delivery of health care but in Liberty's business affairs and its dealings with its employees, staff, physicians, subcontractors, agents, payors and communities it serves. It is the personal responsibility of all who are associated with Liberty to honor this commitment. The Compliance Program SOPs are applicable to Liberty as defined above as well as all members of the Liberty Workforce (employees and subcontracted workforce).

The Compliance Program is intended to provide reasonable assurance that Liberty:

- Promotes adherence to statutes and regulations relating to its operations and business;
- Satisfies the conditions of participation in health care programs funded by the state and federal government and the terms of its other contractual arrangements;
- Complies in all material respects with all federal, state and local laws and regulations that are applicable to its operations;
- Detects and deters criminal conduct or other forms of misconduct by trustees, officers, employees, staff, agents, contractors and subcontractors that might expose Liberty to significant civil liability;
- Promotes self-auditing and self-policing, and responds promptly to inappropriate circumstances and voluntary disclosure of violations of laws and regulations;
- Establishes, monitors, and enforces high professional and ethical standards; and
- Has made a commitment to prevent, detect, and report all suspected cases of fraud, waste, and abuse across all programs and clients that Liberty serves.

PROCEDURE

1. The seven essential elements of an effective compliance program:

According to the U.S. Office of Inspector General (OIG), the seven essential elements of an effective compliance program, are:

- ESTABLISHING A STANDARD MONITORING AND AUDITING PROCESS for evaluating and monitoring compliance related issues and risks; this includes ensuring that the elements of the program remain effective (e.g., Employee Help Line) and that the areas of risk are monitored consistently and appropriately;
- ESTABLISHING PRACTICE STANDARDS AND PROCEDURES by developing written corporate compliance policies and procedures;
- DESIGNATING A CHIEF COMPLIANCE OFFICER (CCO) to oversee and monitor the corporate compliance program;
- CONDUCTING APPROPRIATE EMPLOYEE EDUCATION AND TRAINING that will include both general information about the compliance program and specific training related to job functions with the greatest exposure to compliance issues. Every new employee will receive compliance training within thirty (30) days of employment;
- RESPONDING TO DETECTED OFFENSES AND DEVELOPING CORRECTIVE ACTION INITIATIVES, to allow consistent responses to compliance incidents and deficiencies and develop corrective actions;

- DEVELOPING OPEN LINES OF COMMUNICATION in order to prevent problems from occurring and to have frank discussions of why the problem happened in the first place without the fear of retaliation including having mechanisms for reporting suspected compliance incidents;
- ENFORCING DISCIPLINARY STANDARDS that will result in consistent and appropriate disciplinary actions, sanctions, including the possibility of termination, against the offending individual in order to emphasize ethical behavior.

2. Scope of Liberty’s Compliance Program:

The provisions of the Program apply to all activities performed by Liberty employees and subcontractors. All such personnel are required to act in accordance with the Program as follows:

- Comply with the Liberty Code of Conduct;
- Familiarize themselves with the purpose of the Program;
- Perform their jobs in a manner which demonstrates commitment to compliance with all applicable laws and regulations;
- Report known or suspected compliance issues through the traditional chain of command, to the CCO or his/her designee, or through the Employee Help Line;
- Conduct and/or cooperate and participate in an investigation of any alleged violation and follow through to the point of resolution; and
- Strive to prevent errors and provide suggestions to reduce the likelihood of errors.

3. Policies corresponding to OIG’s compliance program guidelines:

The CCO oversees the effectiveness of the corporate compliance program, which includes, but is not limited to, the elements recommended by the OIG :

- Code of Conduct Policy.
- Corporate Compliance Officer Policy.
- Education and Training Program Development and Implementation Policy.
- Compliance Communication: Helpline Process Maintenance.
- Investigations: Sanction or Disciplinary Action Enforcement.
- Monitoring Tools Policy.
- Corrective Action Plans and Remediation Policy.

4. Disciplinary Actions:

All employees and subcontractors are responsible for complying with the Program, the Code of Conduct and internal policies and procedures, contracts, as well as all applicable laws, rules and regulations. Corrective action for noncompliance will be initiated by the immediate supervisor of the employee(s)/subcontractor(s), who must notify the appropriate Human Resource personnel in accordance with the standard disciplinary policies and procedures of Liberty. Enforcement will be administered by the parties identified by the CCO in consultation with the immediate supervisor and the appropriate Human Resource personnel. Disciplinary actions will be determined on a case-by-case basis and will be issued in a manner that is appropriate, equitable and consistent with the incident.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	12/01/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement

#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#8	08/20/2010	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#17	12/22/2019	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, substantial revisions. Added new sections on FWA and Drug Free Workplace, made other clarifying edits to make more accurate. Added inactivity lock requirement.