

Joshua Tree Senior Living Campus Code of Conduct

Dear Staff:

Integrity is the foundation upon which our facility was created. We are proud of our reputation as a high quality, dependable provider of health care and services in Long Term Care. As members of this organization, we believe in holding ourselves to the highest standards while working to deliver the best possible care and service to our residents.

This Code of Conduct outlines our corporate moral and ethical commitment regarding our long term care practices; it serves as a guide for our Corporate Compliance Program to ensure we adhere to all applicable government rules and regulations, as well as our own policies and procedures. We will continue to review our policies, procedures, and practices as part of our promise to ongoing compliance with regard to changes in laws, best practice guidelines, quality, efficiency, and consistency of providing services.

Furthermore, our Code of Conduct provides the mechanism to encourage employees to report potential problems and allow for appropriate internal inquiry and corrective action. Every employee has a duty to report suspected violations of the rules in functions for which they are accountable. To that end, we encourage you to know the laws and regulations guiding your areas of responsibility and to respond immediately to violations you identify by contacting the facility's Corporate Compliance officer at 216-346-4901 or access our hotline number at 216-906-7800.

Please read this Code of Conduct carefully. In order to have a successful compliance program all members of our organization bear the responsibility to know, understand and comply with these principles.

Sincerely,
Kimberly Coury
Owner - Proprietor

Our Mission

To provide excellence, innovation, and superlative quality in the care of residents, the training of health professionals, and the creation and sharing of health knowledge within a culture that promotes equity, diversity, and inclusiveness.

Our Values

This institution exists to serve others, and does so through the expression of our core values:

Respect

Integrity

Stewardship

Excellence

To recognize the dignity of every person.

To be honest, fair, and trustworthy.

To manage resources responsibly.

To work at the highest level of performance, with a commitment to continuous improvement.

Our Vision

In all that we do, we work to benefit human health and improve the quality of life. We will be:

Our local community's provider of choice for its healthcare needs.

A leader in quality, resident safety, service and compassionate care.

A leader in recognizing opportunities for improvements in clinical care and resident outcomes.

Focusing on innovative care delivery and teaching/training models that respond to the evolving health environment.

Our Commitments

- Legal and Regulatory Compliance**
- Commit to full compliance with the laws and regulations that apply to long term care**
- Support our Code of Conduct**
- Do not provide or accept any gifts, favors, or kickbacks**
- Maintain the privacy of health information**
- Obey antitrust laws**
- Obey laws relating to government and donor contacts**
- Avoid conflicts of interest**
- Carefully negotiate and bid contracts**

Promoting a Positive Environment for our Residents and Ourselves

- Provide safe and efficient quality care to each individual resident that helps them attain their highest practical level of well being**
- Work safely**
- Do not harass or discriminate**
- Use resources wisely**
- Promote and respect the Residents' Rights**
- Do not contract with or employ ineligible persons**
- Reporting suspected wrongful conduct as soon as possible**

Legal and Regulatory Compliance

We are committed to full compliance with the laws and regulations that apply to our business, including all Federal Health Care Programs (i.e. Medicare and Medicaid) requirements, including, for example, preparing and submitting accurate claims and interacting with health care providers consistent with such requirements. Our facility's Corporate Compliance Program has developed and implemented an effective compliance program that is overseen by the Corporate Compliance and Privacy Officer (CCPO) and that includes policies and procedures, training, and a compliance reporting and monitoring system. If you have any compliance related questions or concerns, you may contact the Corporate Compliance and Privacy Officer at (216-346-4901).

All of our officers, managers, administrators, and employees are expected to comply with our policies and procedures and with all Federal Health Care program requirements and other applicable laws.

We cooperate with and support our Code of Conduct by committing the necessary resources to ensure compliance.

We educate ourselves so we know the laws and policies that apply to our performance.

We report suspected wrongdoing and cooperate with investigations.

We know internal corrective action will be taken if we do not follow laws and that unlawful activities **must** be reported.

We know everyone is responsible for making sure we observe high standards of ethical behavior.

Do not provide or accept any gifts, favors, or kickbacks

We follow our facility's policies that prohibit providing or receiving gifts, favors, promotional materials, or kickbacks to or from physicians or other health care providers or vendors who supply us with goods and services.

Maintain the privacy of health information

Consistent with HIPAA and other applicable privacy laws, we carefully avoid unwarranted disclosure of health information by using health information only as necessary to perform our respective job duties. We do not access, use, or disclose health

information for any other purpose, including accessing health information out of curiosity.

Obey antitrust laws

As employees of the facility, we do not share price or wage information with competitors.

Obey laws relating to government and donor contacts

We conduct all political activities and contacts with government officials according to law.

Avoid conflicts of interest

As employees we understand we must avoid even the appearance of a conflict of interest by disclosing pertinent facts and exercising the best care and judgment for our facility, not for personal benefit or for the benefit of others at the facility's expense.

Carefully negotiate and bid contracts

We fairly and accurately bid and negotiate outside contracts at an arm's length and at fair market value.

Promoting a Positive Environment for our Patients and Ourselves

Quality of care and patient safety

We will provide our patients with high quality care, delivered in a safe, efficient, and compassionate way.

Work safely

Everyone is responsible for following standard precautions in caring for residents and for helping others to do so. We will maintain a drug-free workplace and understand this means we may be subject to drug testing for cause. We report any environmental or safety hazards or concerns promptly and follow posted warnings and regulations.

Do not harass or discriminate

We are courteous and respectful to all. Harassment or discrimination of any kind is totally unacceptable and will be reported. This includes discrimination based on race, color, religion, gender, age, national origin, disability, sexual orientation, citizenship or veteran status.

Use assets wisely

We safeguard, invest and use the facility's assets to achieve our mission. Proper use of the facility property and equipment is everyone's responsibility, and we will not misappropriate the facility property or proprietary information. In addition, we avoid waste and try to find ways to cut costs without cutting quality.

Do not contract with or employ ineligible persons

We do not contract with or employ individuals or entities who have been excluded from, or who are ineligible to participate in Federal Health Care Programs. We also do not contract with or employ individuals or entities that have been suspended or debarred from Federal government contracting.

Reporting suspected wrongful conduct as soon as possible

We report suspected wrongful conduct, including suspected violations of any Federal Health Care Program requirements or of our own policies and procedures, either by directly reporting such violations to the CCPO or his/her designee or by calling the Compliance Help Line. The Compliance Help Line can be used anonymously to disclose to our CCPO or another person who is not in the disclosing individual's chain of command, any issues or questions associated with our policies, practices or procedures, including but not limited to those with respect to a Federal Health Care Program believed to be a potential violation of criminal, civil or administrative law. We will not tolerate any threat of or actual retribution or retaliation for making a good faith report of suspected wrongful conduct.

All reports will be kept confidential, investigated if necessary, and all relevant information will be obtained from the disclosing individual and proper follow-up conducted. The CCPO, or his or her designee, shall maintain a confidential disclosure log, which shall include a record and summary of each disclosure received, the state of the respective internal reviews, a summary of findings and any corrective action taken in response to the internal reviews.

Your reporting of suspected wrongful conduct in good faith as soon as you become aware is important. Employees who in good faith report suspected wrongful conduct will be protected from retaliation. Employees also may be protected under the "whistleblower" protections of the Federal False Claims Act. Individuals engaging in wrongful conduct, including the failure to comply with our policies and procedures and all Federal Health Care Program requirements or failure to report such non-compliance will be subject to sanctions which may lead to suspension, termination or other disciplinary action.

The facility and individual employees of our facility who engage in improper conduct also are subject to various significant criminal and civil sanctions for non-compliance, including imprisonment, large money penalties, and exclusion from Federal Health Care Programs and all other Federal procurement and non-procurement programs. For example, under the Federal False Claims Act, a person who makes, or causes to be made, false claims or false statements to a governmental program such as Medicare or Medicaid can be liable for significant penalties.

Staff Responsibilities

Our facility expects all staff to:

- Live the facility values.**
- Read and understand the Compliance Code of Conduct.**
- Think compliance.**
- Act responsibly.**
- Obey all applicable legal and regulatory requirements as well as our facility's policies and procedures.**
- Participate in training.**
- Respect the rights of our facility residents, families, and staff.**
- Maintain confidentiality.**
- Report suspected violations of the law and the facility's Compliance Code of Conduct.**

If you suspect our code is not being honored:

Stop, Think and Clarify

Report your concerns to your supervisor, or call our Corporate Compliance and Privacy Officer at 216-346-4901 or call our confidential Compliance Hotline, 216-906-7800.

For any compliance related inquiries:

Call the facility's Compliance and Privacy Officer: 216-346-4901.