

Reviewed by	Date
Gitel Reich	November 2024

## STANDARDS OF CONDUCT

All affected individuals who work at HCS or who deal with HCS are required to perform their work guided by principles of honesty, high ethical standards, and HCS' mission – "supporting people to lead their best lives in the community of their choice". Affected individuals include employees, chief administrative officer and other senior administrators, managers, contractors, agents, governing body and corporate officers. To help achieve these goals, HCS requires that all affected individuals adhere to the following Standards of Conduct.

- Affected individuals observe HCS' compliance policy as expressed in its Compliance Policy and Procedures Handbook (available on the HCS website) and all applicable laws, rules, and regulations.
- HCS does background checks to ensure that all affected individuals have not been sanctioned by a regulatory agency.
- Affected individuals maintain supporting documentation for all services rendered.
- Affected individuals record services accurately to ensure proper billing.
- Affected individuals bill only for services that have been provided.
- Affected individuals follow established financial and accounting principles and practices.
- All affected individuals who suspect that fraudulent or improper documentation or billing is
  occurring must report such credible suspicion to the Corporate Compliance Officer (or their
  immediate supervisor or manager).
- Supervisors and managers have the responsibility of fostering a work environment in which employees can report credible suspicions or violations of non-compliance without fear of intimidation or retaliation.
- Affected individuals must avoid conflicts of interest. Conflicts of interest can occur when
  an affected individual is faced with a choice between his/her responsibility to HCS and an
  outside or personal interest. Conflicts of interest include, but are not limited to, conducting
  agency business with a company, business or person with whom the affected individual has
  a direct business or personal interest; soliciting or offering agency business or services in
  exchange for payment or other consideration.
  - Affected individuals are responsible for reporting to the corporate compliance officer (or their immediate supervisor or manger) credible suspicions or actual

knowledge they have regarding non-compliance.

- Affected individuals are responsible for cooperating in investigations of allegation of non-compliance.
- Affected individuals who fail to report credible suspicions or actual knowledge of non-compliance or who do not cooperate with investigations can be subject to disciplinary action up to and including termination of employment or contract.
- Affected individuals provide equal care and treatment to all individuals HCS serves in a safe and therapeutic environment
- Affected individuals respect cultural values and religious beliefs of the individuals they serve, employees, visitors, and all other people with whom the affected individual comes into contact in the course of his/her performance of their duties.
- Affected individuals do not engage in discrimination or harassment and provide equal employment opportunities.
- Affected individuals maintain all records required by law and regulation and take active steps to ensure the confidentiality and safety of all records and individual/employee information.
- Affected individuals obtain written permission from the individuals they serve or their parent/guardian to provide services.
- Affected individuals ensure that all communications, records, and advertising are truthful.
- Affected individuals create, maintain, and enhance a professional atmosphere, free of violence and non-prescribed controlled substances. Individuals who are served and employees are valued as human beings and treated with respect.
- Affected individuals avoid conflicts of interest in all therapeutic, referral, and business activities.
- HCS provides ongoing supervision, training, and evaluation of their employees and services.
- HCS seeks out competent employees, vendors, and business partners who have not been sanctioned by a regulatory agency.
- HCS employs managers who are sensitive and open to employee concerns. Grievances are handled without threat of retaliation for good-faith reporting.