



# Code of Conduct & Ethics

Updated September 2021





## A Message from Our Chief Executive Officer

Dear Help at Home Employee:

Since our founding in 1975, our company has grown to serve over 67,000 clients across 12 states with a team of nearly 30,000 employees. I am very proud of this journey and all the people who have contributed to our success.

As we continue to grow, we must stay true to the simple, but enduring values that guide our company: Doing what is right by operating with integrity and adhering to recognized moral and ethical principles.

Our principles are the cornerstone of Help at Home's success. All Help at Home employees are expected to read and follow the Code of Conduct & Ethics and use it to guide their actions. Strive to do good in all that you do, as together we drive towards our vision of being the best at serving seniors and people with disabilities living independently within their communities.

**Chris Hovevar**

Chief Executive Officer  
Help at Home, LLC

# Table of Contents

|   |           |
|---|-----------|
| <b>Section I: We Take Pride in Our Code of Conduct &amp; Ethics</b>               | <b>4</b>  |
| Why Do We Have a Code of Conduct & Ethics (Code)?                                 | 5         |
| Who Has to Follow the Code?   | 5         |
| What Are Leadership Responsibilities?   | 5         |
| How Does the Code Help Us Make Ethical Decisions?                                 | 6         |
| What Happens When Our Code Is Violated?   | 6         |
| Will I Be Punished for Reporting a Violation?                                     | 6         |
| <b>Section II: We Promote an Ethical Workplace</b>                                | <b>8</b>  |
| We Celebrate Our Diverse and Inclusive Workforce                                  | 9         |
| We Respect Each Other   | 10        |
| Are You a Manager or Supervisor of People?  | 10        |
| <b>Section III: We Conduct Business Lawfully</b>                                  | <b>11</b> |
| We Follow the Law   | 12        |
| We Address Conflicts of Interest  | 12        |
| We Follow the Rules About Gifts and Entertainment                                 | 13        |
| Anti-Bribery and Anti-Corruption Laws   | 13        |
| False Claims Act  | 14        |
| Coding & Billing Compliance   | 15        |
| Antitrust Laws  | 15        |
| Marketing Laws  | 15        |
| Information Involving People We Support – HIPAA Privacy & Security                | 16        |
| Information Involving Employees   | 16        |
| Company Confidential Information  | 16        |
| We Work With Integrity With Our Local Agency Partners, Suppliers, and Competitors | 17        |
| Waivers to This Code  | 17        |
| <b>Section IV: We Understand Our Responsibility to Others</b>                     | <b>18</b> |
| We Maintain a Safe & Healthy Workplace  | 19        |
| Rights of Individuals We Serve – Client Code of Ethics                            | 19        |
| Client Abuse & Neglect  | 19        |
| Background Check  | 19        |
| Professional Licensure  | 19        |
| <b>Section V: We Safeguard Our Company's Assets</b>                               | <b>20</b> |
| We Protect Our Assets   | 21        |
| We Maintain Accurate Records  | 22        |
| Surveys and External Audits   | 22        |
| Record Retention  | 22        |
| Don't Speak on Behalf of Our Company if Not Authorized                            | 22        |
| Social Media  | 23        |
| <b>Section VI: We Are Good Members of the Community</b>                           | <b>24</b> |
| We Give Back  | 25        |
| Political Activities  | 25        |
| <b>Closing Thoughts from Our Chief Ethics &amp; Compliance Officer</b>            | <b>26</b> |
| <b>Key HAH Company Contacts</b>   | <b>27</b> |
| <b>Additional Resources</b>   | <b>28</b> |

## **SECTION I**

# We Take Pride in Our Code of Conduct & Ethics

### Why Do We Have a Code of Conduct & Ethics?

We take pride in our Help at Home, LLC (HAH) Code of Conduct & Ethics (Code) because it helps guide us to do our job lawfully and ethically. Our Code serves as a reference guide for the laws, regulations, and company policies that affect our business, as well as some resources we can reach out to for help. Our Code helps us be the best at serving seniors and people with disabilities living independently within their community.

The Code doesn't cover every situation you may face on the job, so it's important to use good judgment in everything that you do and to ask for help if you're ever unsure about the right course of action. We periodically review and update the Code. To ensure that you are reviewing the latest version, we encourage you to visit <https://www.helpathome.com/compliance> for any updates. You should also be aware of your relevant State Employee Handbook and [additional resources](#) listed at the end of this document.

### Who Has to Follow the Code?

All HAH employees must follow the Code. We also have a responsibility to understand and communicate with each other about the standards we've put into place to ensure we continue to be leaders in the home health care space.

### What Are Leadership Responsibilities?

While all HAH employees are obligated to follow our Code, we expect our leaders to set the example and be a model for all employees. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a manner that is kind, thoughtful, and respectful. We expect each supervisor to create an environment in which all team members are encouraged to raise concerns and propose ideas.

We also expect leaders to ensure their team has sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. They must help to create a culture within HAH that promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives. In addition, all leaders should be mindful that HAH supports and utilizes various training mechanisms to ensure that our supervisors have excellent managerial skills.

The time is  
always right  
to do what is  
right.

– Martin Luther King, Jr.

We expect leaders to lead by example, confront problems directly and candidly, be inclusive in making decisions, try to give the maximum responsibility to those who work with them, and emphasize effective team-building. We expect those in our organization to understand and care about their colleagues at work. Although HAH is a large organization, its work is accomplished each day, for the most part, in small team settings across our service area. This structure should encourage all leaders to ensure that the talents of each member within the organization are utilized to the maximum extent possible and that we give careful attention to the professional development of all staff at HAH.

### How Does the Code Help Us Make Ethical Decisions?

The Code is the starting point, rather than the finish line, of ethical decision-making. It highlights a basic framework and references supporting policies and helpful examples to help us recognize when and how issues may arise. While no Code could have the answer to every question you might have or every situation you might face, it is a roadmap to how we can best serve others and work together.

#### Here are four key questions to ask yourself when considering ethical decision-making:

1. Does this action comply with our Code of Conduct and policies?
2. Is it legal?
3. Does it reflect our HAH Core Values?
4. Would I feel good if my actions were made public and known to family and friends?

If you can answer “Yes” to all four of these questions, it’s almost certainly safe to proceed. If you are unsure, you should ask for assistance.

### What Happens When Our Code Is Violated?

HAH is built on integrity and ethical decision-making. When one person violates our Code, it affects us all. If you think a Code/Policy may have been violated, speak up. HAH has an “Open-Door Reporting Policy,” which means that we encourage you to talk to your supervisor or management at any time should you have questions or concerns about Code or policy violations. You also may reach out to your regional

manager or the Human Resources department for help at any time at [AskHR@helpathome.com](mailto:AskHR@helpathome.com). If you’re not comfortable speaking to your supervisor directly, there are other resources available to help you 24 hours a day, 7 days a week.

The Ethics Hotline is accessible 24 hours a day by phone at 1-844-769-0288 or online via <https://helpathome.ethicspoint.com> as well as <https://helpathomemobile.ethicspoint.com>. You may report anonymously if you wish. When you contact the Ethics Hotline, the information you provide is documented in detail and forwarded to the appropriate department within HAH for review and investigation.

### Will I Be Punished for Reporting a Violation?

We don’t tolerate punishment or retaliation for reporting a violation. We know it takes courage to come forward and share your concerns. We won’t retaliate or permit retaliation against anyone who makes a good faith report about possible misconduct or legal violations to HAH or a government authority or assists in an investigation of misconduct or legal violation. Reporting a complaint will in no way be used against the employee or have an adverse impact on the individual’s employment status.

**Question:** Which types of issues can I report to the Ethics Hotline?

**Answer:** Here are examples of some questions/concerns you may report to the Ethics Hotline if you are not comfortable reporting them directly to your manager or regional leader:

- Abuse or mistreatment of clients
- Discrimination or harassment
- Conflicts of interest
- Accounting or financial issues
- Code violations/policy violations
- Theft, waste, fraud, or bribery
- Environmental or safety issues

**Question:** Is the Ethics Hotline really anonymous?

**Answer:** Yes. If you do not provide your contact information or identify your name or phone number to the third-party Ethics Hotline, your identity cannot be confirmed.

**Question:** Can I be retaliated against by management if I report a violation of the Code in good faith that turns out to be incorrect?

**Answer:** No. If you make a report in good faith, and that report turns out to be unfounded upon further investigation, you will not be retaliated against. We encourage all employees to speak up regarding any perceived policy violations.



## **SECTION II**

# We Promote an Ethical Workplace

**We Celebrate Our Diverse and Inclusive Workforce**

Each of us brings a different background and experience to the HAH team. It's that diversity of backgrounds, cultures, and viewpoints that drives our success at being the best at what we do. HAH promotes an inclusive work environment where no single gender, nationality, race, religion, identity has a monopoly on talent. We celebrate diversity and inclusion.

We provide equal employment opportunity and don't discriminate against anyone on the basis of race, color, religion, gender, sex, sexual orientation, gender identity or expression, age, national origin, citizenship status, marital status, disability, genetic information, status as a protected veteran by federal law, or any other legally protected category.

**Question:** If my colleague/supervisor doesn't like me personally, is that considered unlawful harassment or discrimination?

**Answer:** No. Unlawful harassment addresses conduct that's based on legally protected categories. However, even though it's not a legal matter, there may still be an issue if the behavior creates an offensive, hostile, or intimidating work environment. Consider reaching out to the Human Resources Department or feel free to report your concern anonymously to the Ethics Hotline.



### We Respect Each Other

We foster a work environment that is free from harassment or discrimination. We don't tolerate any behavior (whether verbal, visual, physical, or sexual) that would create an offensive, hostile, or intimidating work environment.

Employees who have concerns regarding discrimination, harassment, or the company's compliance with any other laws are encouraged to bring their concerns forward to their manager, the Human Resources Department or report anonymously to the Ethics Hotline.

### Are You a Manager or Supervisor of People?

As a manager of other HAH staff, you have a special responsibility to lead with integrity. Set a good example for your team through your words, tone, and actions, and by always doing what is right and in compliance with our Code. Be the kind of leader who people feel comfortable approaching, so the sooner an issue is raised, the sooner it can be addressed.

**Question:** What are some examples of inappropriate behavior?

#### Answer:

- Joking about someone's ethnic, national, or cultural background
- Unwanted or unwelcome touching or hugging
- Discussing sexual activities displaying obscene posters or cartoons or otherwise transmitting obscene or sexually explicit materials
- Forwarding email materials that degrade or express hate against a gender or ethnic group

**Question:** My manager often loses his temper and yells at the supervisors in the office when we make mistakes. Is this unlawful harassment?

**Answer:** It depends. But if the situation creates a negative work environment, share your concerns with the Human Resources Department or feel free to report your concern anonymously to the Ethics Hotline.

**Question:** As a leader, how can I model good behavior for my team?

#### Answer:

- Promote our Open-Door Reporting Policy.
- Support employees who come forward in good faith to share their concerns or raise questions.
- Listen, take good notes, and work to resolve issues as quickly and effectively as possible.
- Show your staff that they can ask for help when they are not sure of the right way to proceed.
- Make sure employees aren't subjected to retaliation for asking questions or reporting concerns.

### **SECTION III**

# We Conduct Business Lawfully

### We Follow the Law

We operate in an industry that's highly regulated at the federal, state, and local levels, so we follow both the letter of the law (the actual words), as well as the spirit of the law within each of our states. Our commitment builds trust with our partners, ensures that we provide the highest quality of service to our clients, and protects our brand.

### We Address Conflicts of Interest

We have a duty to act in HAH's best business interests and avoid even the appearance of a conflict of interest.

A conflict of interest can occur when an employee's private interests interfere with his or her judgment and/or proper execution of his or her job responsibilities as an employee of HAH. A conflict of interest also could exist if the demands of any outside activities distract from the performance of the employee's job or cause the employee to use HAH's resources for a non-HAH purpose.

If you discover that a personal activity, interest, or association could create (or appear to create) a conflict of interest—you must disclose it immediately to your manager, the Human Resources Department, or Compliance Department at [compliance@helppathome.com](mailto:compliance@helppathome.com) for further assistance. Many conflicts of interest can easily be avoided or addressed if they are promptly disclosed and properly managed.

It is not possible to describe every possible scenario that could present a conflict of interest, but below are some common examples in which conflicts could arise. Being able to recognize a potential conflict of interest can help you avoid one.

**Question:** Can you give me some examples of conflicts of interest?

#### Answer:

- You have a personal relationship with a client that interferes with your ability to provide quality care and services to that client.
- You supervise or conduct business with someone with whom you have a close personal relationship.
- You are asked to invest in one of our suppliers or in a client's family business.
- You are asked to serve on a board of an organization that does business with HAH.
- You take for yourself a business opportunity that is meant for HAH.

It takes less  
time to do a  
thing right  
than to explain  
why you did it  
wrong.

– Henry Wadsworth Longfellow

## **We Follow the Rules About Gifts and Entertainment**

### ***Receiving or offering gifts to/from customers and clients***

While the occasional small, nominal gift or offer of entertainment is often viewed as a normal part of doing business, sometimes even a well-intentioned gift can cross the line and create a sense of obligation or compromises your professional judgment, which is never permitted. Always turn down any offer if it is being given to influence a decision, even if it is below the HAH threshold to receive a gift (less than \$50).

### ***Receiving or offering gifts to/from government employees***

The rules for giving gifts, entertainment, or travel to government employees or public officials are very strict, and violating them can have serious consequences for the giver, HAH, and the receiver of the gift. As a result, HAH never offers or provides gifts or anything of value to someone affiliated with the government.

Reach out to the Compliance Department at [compliance@helpathome.com](mailto:compliance@helpathome.com) with any questions about conflicts of interest.

**Question:** What if I receive a gift from a client that I know that I can't accept. What should I do?

**Answer:** Return the gift to the client and politely explain our policy. If the gift is something perishable, like flowers or a food basket, for which return is not really an option, place it in a common area where it can be enjoyed by the rest of the team.

## **Anti-Bribery and Anti-Corruption Laws**

The Anti-Kickback Statute applies in all situations in which employees perform services that are paid by a federal or state health care program (Medicare and Medicaid, etc.). Because of this rule, HAH strictly prohibits giving or receiving any gifts, gratuities, or business courtesies to any of our business partners if one of the purposes is to reward past business referrals or to encourage future business referrals.

### **The Federal Anti-Kickback Statute prohibits any person or entity from:**

- 1.** Directly or indirectly offering, paying, soliciting, or receiving anything of value
- 2.** To induce or reward patient referrals or generate other business
- 3.** Involving any item or service covered by Medicare, Medicaid, or any other federal or state health care program

In short, inducing or rewarding others for business referrals is strictly prohibited and may very well violate the Anti-Kickback Statute and other applicable Federal and state laws.

We expect our employees, officers, and directors to refrain from any conduct that may violate federal and state laws governing patient/client referrals, health care financial relationships, and participation in any federal or state health care benefit program, such as Medicare, Medicaid, VA, and other state-funded agencies.

There are many similar state laws. These laws are broad and may apply to some of our activities or our relationships with patients/clients/customers or business partners. Federal and state Stark laws also prohibit physician referrals to entities in which a physician, or the close relative of a physician, has a financial interest.

HAH does not currently conduct business in any jurisdiction outside of the United States and does not do business with any foreign government or officials of any foreign government. If, in the future, we engage in business activities that might involve foreign jurisdictions or foreign government officials, our policy will be to comply with all anti-corruption laws that apply to our operations, including the Foreign Corrupt Practices Act (“FCPA”) and the anti-corruption laws of such jurisdictions. Such policies would prohibit, among other things, giving, offering, or authorizing the provision of anything of value to, or for the benefit of, a foreign official, in order to obtain or retain business, to secure any other business advantage, or to obtain beneficial governmental treatment. If such policies are adopted, HAH will train affected personnel on the provisions of the FCPA and related policies.

Knowing and willful violations of these federal and state laws may result in criminal and/or civil prosecution and penalties, including imprisonment. In addition, knowing and willful violations of these federal and state laws will be subject to disciplinary action up to and including termination of employment and legal action.

### False Claims Act

HAH is committed to complying with all applicable federal and state laws, particularly those laws that are designed to address identified instances of health care fraud, waste, and abuse. To that end, HAH is committed to complying with the Federal False Claims Act (“FCA”) and provisions of the U.S. Deficit Reduction Act of 2005 (“DRA”) including but not limited to, establishing processes and procedures designed to detect and prevent health care fraud, waste, and abuse, and providing information to all employees, contractors, and agents about federal and state False Claims Acts.

#### Examples of billing practices that violate these laws include, but are not limited to:

1. Filing a claim for services that were not performed or were not performed as described on the claim form.
2. Filing a claim for services that were performed but were not medically or otherwise necessary.
3. Submitting a claim containing information you know to be false.
4. Direct care employees using an Electronic Visit Verification tool to clock-in and clock-out from a client home location and not performing the work.
5. Submitting a time sheet that includes time not worked.

The FCA and similar state or local laws impose civil liability on any person or entity who submits a false or fraudulent claim for payment to the United States government.

A false claim can result in serious civil and/or criminal penalties against HAH and individual employees, including significant financial penalties and criminal prosecution.

### Coding & Billing Compliance

We are committed to ensuring that our coding and billing practices comply with all applicable federal and state laws, regulations, guidelines, policies, and local contract requirements. HAH assures that all client records and reports are prepared and maintained accurately. All claims submitted to any government or private health care program, individual, department, or agency shall be accurate and conform to all pertinent federal and state laws and regulations. All billing errors, inaccuracies, recoupments, or issues shall be immediately reported to your supervisor and the Compliance Department at [compliance@helppathome.com](mailto:compliance@helppathome.com) so that these issues may be promptly addressed.

### Antitrust Laws

The purpose of antitrust laws is to create a level playing field in the marketplace, as well as to promote fair competition. You must always follow all applicable laws and regulations designed to regulate competition. Actions that violate antitrust laws include entering into or negotiating an agreement with a competitor to (1) fix prices (rates) at any level or fix other terms of service; (2) allocate customers or markets; or (3) boycott a supplier or customer. If you have any questions regarding the appropriateness

of any form of negotiation or agreement, you should refer your questions to the Compliance Department at [compliance@helppathome.com](mailto:compliance@helppathome.com). In addition, any suspected violations are to be referred to the Compliance Department. The Compliance Department will consult with legal counsel, as required.

### Marketing Laws

Marketing practices at HAH must always be based on factual information. We do not engage in negative comments regarding other providers of service. Distortion of the truth or making false statements is strictly prohibited. If you are involved in marketing or promoting to future clients, you must be familiar with and comply with all applicable rules and regulations. Our potential clients must have sufficient and accurate information in order to make informed decisions.



### Information Involving People We Support – HIPAA Privacy & Security

All information concerning persons supported by HAH must be considered confidential and access limited to the person supported, guardian or legal representative, persons providing support, or other persons specifically authorized. All programs and services must ensure that the individual's right to privacy is honored at all times. Without specific informed authorization, any information, whether written, electronic or social media, video, photographic, audio, or other personal information, may not be disclosed.

We recognize the sensitive nature of this information and are committed to maintaining confidentiality as required by local, state, and federal regulations. Under the Health Insurance Portability and Accountability Act ("HIPAA") and the Health Information Technology for Economic and Clinical Health Act ("HITECH"), you may discuss person-specific health/medical information with others only when necessary to provide a service or as permitted by law. Person-specific information may be released for all other purposes only with written authorization from the person supported or that person's legal guardian, as appropriate. You may not disclose protected health information (PHI) that violates the privacy of any client, because such disclosure would be a violation of the HIPAA privacy rules. All contractors and vendors that create, receive, maintain, or transmit PHI while performing certain functions are required to sign a Business Associate Agreement. Business Associate Agreements will be submitted to the legal department.

Any confirmed or suspected breach of confidential

information should be reported immediately to your local supervisor, the Compliance Department at [compliance@helppathome.com](mailto:compliance@helppathome.com) or IT Security at [security@helppathome.com](mailto:security@helppathome.com). Any questions regarding PHI should be discussed with your supervisor. If any question remains, please reach out to HAH's Compliance Department and Privacy Officer at [compliance@helppathome.com](mailto:compliance@helppathome.com).

### Information Involving Employees

HAH is committed to respecting employee privacy and keeping important personal information of our employees confidential. Personal information is any information that could be used to identify someone, either directly or indirectly, such as a name, employee ID, email address, or phone number. There are data privacy laws that prescribe how to responsibly collect, store, use, share, transfer, and dispose of personal information, and we strive to comply with those laws everywhere we operate. Please refer any questions to HAH's Compliance Department at [compliance@helppathome.com](mailto:compliance@helppathome.com).

### Company Confidential Information

HAH is committed to being conscientious and accountable when handling confidential company information. HAH business, health, and financial information is considered confidential and therefore must be protected by an effective internal control environment (including policies and procedures to secure the company's assets) and made available outside the company only with appropriate approval of the CEO or CFO.

Examples of company confidential information includes branch openings, financial forecasts, or changes to the executive management team. Do not

share company confidential information with friends, family, or anyone outside the company.

### **We Work with Integrity with Our State and Local Agency Partners, Suppliers, and Competitors**

#### ***Federal, State, and Other Local Partners***

We are proud to partner with many federal and state health care regulatory agencies, managed care organizations, area agencies on aging, and other local agencies in order to provide quality services to clients. As with all of our customers, we strive to be a responsible partner and recognize the importance of adhering to all contract requirements.

#### ***Suppliers***

We choose suppliers based on factors like quality, cost, availability, and service. We hold our suppliers to the same high standards that we hold ourselves and expect that all vendors or contractors who conduct business on our behalf will operate ethically and in compliance with the law.

#### ***Competitors***

It's okay to gather information about our competitors and their customers, suppliers, and vendors, provided we do so legally and ethically. Use good judgment. Gather information from public sources and customer feedback.

### **Waivers to This Code**

In certain extraordinary circumstances, a waiver of the provisions of the Code (other than matters required by law) may be granted. Contact the Compliance Department at [compliance@helpathome.com](mailto:compliance@helpathome.com) if you believe special circumstances warrant a waiver of any provisions of the Code.

### **Are you responsible for a government contract?**

- Understand the unique legal requirements and restrictions associated with this work.
- Know the rules around the procurement process if dealing with the government.
- Be accurate, current, and complete in anything you submit.
- Follow the rules on gift-giving/receiving.
- Ask your supervisor for guidance if something is unclear.

## SECTION IV

# We Understand Our Responsibility to Others

### **We Maintain a Safe & Healthy Workplace**

We're committed to providing you with a safe and secure workplace.

#### ***Do your part:***

- Be proactive in promoting your own health and safety.
- Follow our policies and procedures.
- Only undertake work you're trained to do.
- Be alert to safety risks to clients and caregivers. Any illegal, violent or suspicious activity should be reported.

#### ***We don't tolerate:***

- Threats of any kind.
- Intimidation.
- Working under the influence of any intoxicants.
- Possession of a weapon of any kind on HAH property, including parking lots (except where specifically permitted by law), at a customer's home or premises, while engaged in a company activity, or at a company-sponsored event, is prohibited with the exception of authorized security personnel.

#### ***If your job involves operating a company vehicle or using your own vehicle to conduct company business:***

- Observe safe driving practices.

### **Rights of Individuals We Serve – Client Code of Ethics**

HAH is an advocate of supporting the rights and dignity of all people supported in its programs. As providers, we are sensitive to cultural beliefs and practices of the people we support. In addition to having a company-wide Code, we follow client codes

of ethics in the regions that we operate, with a focus on our interactions with the individual client.

### **Client Abuse & Neglect**

HAH has zero tolerance for client abuse and neglect. If you are aware of abuse or neglect, your obligation is to report it immediately through the established channels at your location. There are time frames for reporting such incidents in each state and it is very critical for you to follow the guidelines at your operation. It is everyone's responsibility to uphold the mission statement of providing respect and care. Any employee who believes a report of client abuse or neglect is not being addressed should report their concerns to the Ethics Hotline.

### **Background Check**

HAH is committed to providing a safe and secure environment for our employees, clients, customers, and vendors. HAH also must comply with federal and state requirements as it pertains to the services we provide. To that end, HAH requires pre-hire background checks and other appropriate screenings. The U.S. Department of Health & Human Services Office of the Inspector General (HHS-OIG) screenings are performed in accordance with state and corporate policy. Newly-hired employees cannot report to work unless and until the necessary background and other screenings have been completed and approved.

### **Professional Licensure**

If any HAH staff are licensed or certified clinicians (including, but not limited to, physicians and nurses), they will uphold the clinical practice guidelines promulgated for their specific license or certification and state. Moreover, they will maintain the current status of their licensure or credentials and comply with all federal and state requirements for their professional discipline.

## **SECTION V**

# We Safeguard Our Company's Assets

## We Protect Our Assets

In general, you shouldn't use HAH's assets for your personal activities. Occasional personal use of things like accessing a personal email account, internet access, phone, and fax machines is okay as long as it:

- Doesn't interfere with your work (or anyone else's).
- Doesn't violate the law or our policies.
- Doesn't incur additional costs to HAH.
- Isn't for personal gain or political purposes.

Remember that anything you create, send, receive, download, or store on HAH systems is company property and may be reviewed at any time, where permitted by law. You shouldn't have any expectation of privacy when it comes to using our electronic systems. You can help us protect our systems from viruses and downtime by keeping in mind the following:

### Electronic Do's and Don'ts

#### Do:

- Ensure the physical security of information or hardware assigned to you.
- Keep passwords and PINs in a secure location and don't share them with anyone.
- Log off, or lock the screen, of your computer or device when left unattended.

#### Don't:

- Install unauthorized software, applications, hardware, or storage devices on your computer.
- Access our network through unauthorized applications or devices.
- Download music files.
- Use unlicensed software (it's illegal).
- Make copies of software, associated manuals, or other materials to use at home or for someone else to use outside of HAH.
- Put software on a local area network (LAN) for use by others.

### **We Maintain Accurate Records**

Our records—and our record keeping—help us to fulfill our compliance and financial commitments, keep us accountable to our stakeholders, and help us to make important strategic decisions. That's why records that are clear and complete and accurately reflect our business transactions are critical to HAH.

We maintain a system of internal controls and procedures that we believe provides reasonable assurance that transactions are executed in accordance with management's authorization and are properly recorded and that financial records and reports are accurate and reliable. This system includes written policies and procedures.

Each of us has an obligation to follow all internal controls in recording and maintaining our company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement, or simply completing a time sheet, be honest, accurate, and complete.

### **Surveys and External Audits**

In preparation for, during and after surveys and external audits, HAH employees must interact with all external auditing bodies in a direct, open, and honest manner. No action should ever be taken in relationships with surveying bodies that would mislead the external survey teams, either directly or indirectly. The scope of matters related to external agency surveys is extremely significant and broader than the scope of this Code. The purpose of our Code is to provide general guidance on subjects of wide interest within the organization.

We respond to surveys with openness and accurate information. In preparation for or during a survey

or inspection, HAH colleagues must never conceal, destroy, or alter any documents; lie; or make misleading statements to the agency representative. HAH colleagues also must never attempt to cause another colleague to provide inaccurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law. Anyone aware of violations or suspected violations of truthful and factual representations and responses to survey agencies must report them immediately through the chain of command or to the Compliance Department at [compliance@helpathome.com](mailto:compliance@helpathome.com).

### **Record Retention**

Records include paper documents, such as letters and memos, computer-based information, such as email, and computer files on hard drive, USB, cloud, or any other storage device. In addition, any other medium that contains information about HAH or the business activities we support are considered records. All records must be retained in accordance with the applicable law and record retention policies specific to your operation or department. Record destruction may occur only according to HAH policy. Any employee who falsifies or improperly destroys records will be subject to corrective action, up to and including termination of employment.

### **Don't Speak on Behalf of Our Company if Not Authorized**

In order to ensure that accurate and complete information is conveyed to the public, to regulatory authorities, and to others, we have designated individuals to serve as our official company spokespersons. Unless you are authorized to do so, do not make any public statements on HAH's behalf

in any forum. When using social media for personal reasons, make clear that you do not speak on behalf of the company.

### **Social Media**

Social media has redefined how we communicate and share what is happening in our lives. This policy provides you with guidance on what is and what is not appropriate to post on social media when it comes to your work at HAH. When posting, use sound judgment and common sense by adhering to company values and following our established and applicable policies.

Only authorized individuals may speak on behalf of HAH, including on social media. As a general principle, your posts, tweets, and chats should reflect that you are providing your personal point of view only and may never claim to reflect those of HAH unless you have been specifically authorized to speak for the Company. You are responsible for clarifying that your social media communications reflect your personal views and not those of HAH.



## **SECTION VI**

# We Are Good Members of the Community

### We Give Back

As a company, we're committed to enriching the communities we serve. We support various organizations, including the Help at Home Cares Fund and our Give Back time program. For employees who wish to involve themselves in a political process, such participation is entirely voluntary and must be made on personal time and not cause harm or embarrassment to HAH.

As always, please ensure your activities are lawful and consistent with our [Conflict of Interest Policy](#) discussed above. For example, you should never use or donate HAH assets or funds to any outside activity, unless you have received approval in advance from our Chief Financial Officer, Chief Legal Officer, and Chief Executive Officer. For any questions, please reach out to the Compliance Department at [compliance@helppathome.com](mailto:compliance@helppathome.com).

### Political Activities

HAH does not make political donations. Employees may not pressure or solicit other employees to make political contributions or participate in the support of a political party or candidate. If you are asked to work with legislators as part of your role with HAH, please make sure you follow all applicable disclosure rules. Discuss these activities with the Compliance Department at [compliance@helppathome.com](mailto:compliance@helppathome.com) or Chief Legal Officer to determine in advance if disclosure and other rules apply.





## Closing Thoughts from Our Chief Ethics & Compliance Officer

Dear Help at Home Employee:

Our Core Values and company culture are the roots of our organization. In everything we do, we put the health, safety, and well-being of clients and employees at the forefront. We perform our duties ethically and in full compliance with applicable laws and regulations. The Compliance Department is here to work with you to ensure that our reputation is protected. Our duties include helping you understand and act in accordance with the laws and regulations applicable to our company and industry, the high ethical standards to which HAH holds us all, and responding to reports of incidents that fall short of these high standards.

Our Code sets forth the standard for how we serve others and work together as one team. If you want to talk about a situation, please contact your manager, the Human Resources Department, or the Compliance Department at [compliance@helpathome.com](mailto:compliance@helpathome.com). You also may voice your concerns anonymously by calling our confidential Ethics Hotline. It's our reputation; let's all work together to protect it.

A handwritten signature in black ink that reads "Howard". The script is fluid and cursive, with a large, stylized 'H' and a long, sweeping underline.

**Howard T. Wall, III**

Chief Ethics & Compliance Officer  
Help at Home, LLC

# Key HAH Company Contacts

| CONTACT  | FOR HELP WITH  | CONTACT INFORMATION   |
|--|--|---|
| Chief Ethics & Compliance Officer<br>Howard T. Wall, III | Questions or concerns about laws, our Code, supporting policies              | <a href="mailto:hwall@helpathome.com">hwall@helpathome.com</a>  |
| Chief Legal Officer<br>Joe Bonaccorsi                    | To raise questions or concerns about legal matters and conflicts issues      | <a href="mailto:jbaccorsi@helpathome.com">jbaccorsi@helpathome.com</a>  |
| Chief Privacy Officer<br>Deon Falcón                     | Privacy or confidentiality of client or employee information; HIPAA concerns | <a href="mailto:dfalcon@helpathome.com">dfalcon@helpathome.com</a>  |
| Chief Security Officer<br>Chris Lockery                  | Technology concerns, including cybersecurity risks                           | <a href="mailto:clockery@helpathome.com">clockery@helpathome.com</a>  |
| The Compliance Department                                | Questions or concerns about laws, our Code, supporting policies              | <a href="mailto:compliance@helpathome.com">compliance@helpathome.com</a>  |
| The Human Resources Department                           | Human Resource concerns  | <a href="mailto:AskHR@helpathome.com">AskHR@helpathome.com</a>  |
| IT Security Incident                                     | To report IT Security concerns   | <a href="mailto:security@helpathome.com">security@helpathome.com</a>  |
| Ethics Hotline   | To report any concern  | 1-844-769-0288<br><br><a href="https://helpathome.ethicspoint.com">https://helpathome.ethicspoint.com</a> or<br><a href="https://helpathomemobile.ethicspoint.com">https://helpathomemobile.ethicspoint.com</a> |

# Additional Resources

The Code doesn't cover every situation you may face on the job, so it's important to use good judgment in everything that you do and to ask for help if you're ever unsure about the right course of action. You also should be aware of the following resources that are provided for your reference:

- State Employee Handbooks: Available at local Branch offices
- Corporate Administrative Handbook: Available at local Branch offices or Corporate Support Center
- HIPAA Privacy Policies and Procedures: Available at <https://www.helpathome.com/compliance>
- HIPAA Security Policies and Procedures: Available at <https://www.helpathome.com/compliance>
- Office of Inspector General, US Department of Health and Human Services: <https://oig.hhs.gov>
- United States Sentencing Guidelines: <https://www.ussc.gov/guidelines/2015-guidelines-manual/2015-chapter-8>



## **ETHICS HOTLINE**

by phone at 1-844-769-0288 or  
online via <https://helppathome.ethicspoint.com>  
and <https://helppathomemobile.ethicspoint.com>

Accessible 24 hours a day



**Help at Home**®  
Care to Live Your Life.