Supplier Code of Conduct



Help at Home®
Care to Live Your Life.



“We encourage you to bring integrity and care to everything you do, as together we work toward our shared vision: being the best at serving seniors and people with disabilities, helping them live independently and thrive within their communities.”



A Message From Our

Chief Executive Officer

Dear Help at Home Supplier:

Since our founding in 1975, our company currently serves nearly 60,000 clients/patients across eleven states and our team is over 50,000 employees. I am very proud of this journey and all the partners 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:

Operating with integrity and adhering to recognized moral and ethical principles is the cornerstone of Help at Home’s success. Help at Home suppliers are expected to review and adhere to the Supplier Code of Ethical Business Conduct.

Sincerely,

CHRIS HOCEVAR
Chief Executive Officer
Help at Home, LLC

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Overview and Purpose

Overview

The Help at Home HAH Holdings LLC (Herein referred “HAH”) and its subsidiaries comprised of Home Care, Home Health Care, and other HAH wholly owned entities and all employees of those entities are committed to striving to meet the highest standards of professional ethics and integrity and expect our vendors, suppliers, and business partners (“Suppliers") to adhere to the same standards. he Help at Home Holding LLC (Herein referred as “HAH”)

Purpose

The HAH Supplier Code of Conduct (Herein referred “Supplier Code”) is designed to assist our Suppliers in understanding our expectations. This Supplier Code describes the minimum standards that Suppliers are expected to meet in connection with their business exchanges with HAH. Suppliers are encouraged to exceed the standards in this Supplier Code. In addition, Suppliers must also comply with the requirements included in purchase orders, contracts, or other agreements with HAH.

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Ethical Standards

HAH operates with integrity and adheres to established ethical principles and in accordance with federal, state, and local laws and regulations. HAH seeks to do business with Suppliers that conduct business with ethical standards consistent with those of HAH. All HAH suppliers are expected to conduct their business in an ethical manner and to act with integrity, including adhering to the following ethical standards and guidelines: HAH operates with integrity and adheres to established

Business Integrity

Suppliers shall act with integrity and in a professional manner while not engaging in unlawful or unethical activities. Suppliers shall conduct business competitively and in full compliance with all applicable laws, rules, and regulations. Suppliers shall employ fair business practices including but not limited to accurate and truthful advertising, avoiding improper giving, and receiving of gifts, and insider trading activities.

Conflicts of Interest

HAH evaluates real and potential conflicts of interests to make procurement decisions that serve HAH's interests. HAH employees are not permitted to conduct HAH business with a Supplier if a member of such employee's immediate or extended family is employed by or has an economic interest in the supplier. In return, Suppliers shall disclose all potential conflicts of interest.

HAH requires employees and Suppliers to promptly disclose any actual or potential conflict of interest to HAH Compliance Department. Questions and guidance concerning conflicts of interest may be directed to the HAH Ethics, Compliance and Privacy Department via email Compliance@helpathome.com or for anonymous reporting contact our Ethics Help Line at **1-844-769-0288**.

Gifts and Entertainment

We establish guidelines for the offer and acceptance of gifts.

It is inappropriate for suppliers to give directly or indirectly, any gifts (including cash, services, favors, entertainment, offers of employment or other things of value) that may improperly influence, or appear to influence, business relationships. Small perishable items may be allowed. However, you must notify the department manager or supervisor before providing gift of any kind.

The giving of gifts to, or receiving gifts from, individuals or businesses who are doing business with (or who are seeking to do business with) the Company, or who may represent a possible source of referrals for clients/patients or other business, may be contrary to law. Please check with your supervisor or email the Ethics, Compliance and Privacy Department with any questions about such gifts at Compliance@helpathome.com or for anonymous reporting contact our Ethics Help Line at **1-844-769-0288.**



Anti-Kickback, Anti-Bribery, Anti-Corruption Trade and Antitrust Compliance

Suppliers shall have a zero-tolerance policy for any form of corruption, bribery, extortion, embezzlement or other type of fraudulent conduct. Suppliers shall not pay or accept bribes or participate in other illegal activities in business or government relationships, including but not limited to monetary gifts, kickbacks, bribes, rebates or any other type of value, remuneration or services in return for goods, services, and/or favorable treatment or consideration.

The Anti-Kickback Statute applies in all situations in which Suppliers perform services that are paid by a federal or state health care program (Medicare and Medicaid, and related programs.). HAH 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 client/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.

There are many similar state laws. These laws are broad and may apply to some of our activities or our relationships with client/patient /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, 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.



Antitrust Laws

The purpose of the antitrust laws is to provide customers choices for products and services by creating a level playing field in the marketplace through the promotion of fair competition. Suppliers must always follow all applicable laws and regulations designed to regulate competition because failure to do so can lead to civil and criminal liabilities—for Suppliers and HAH.

Actions that violate antitrust laws include, but are not limited to, discussing, negotiating, and/or entering into an agreement with a competitor to

1. Share competitively-sensitive information without legitimate justification;
2. Competitively fix prices (rates) at any level or fix other terms of service;
3. Allocate customers or markets;
4. Boycott a Supplier or customer;
5. Coordinate HR hiring or solicitation decisions.

If you have any questions regarding the appropriateness of any form of discussion, negotiation, or agreement, you should refer your questions to the HAH Legal Department via email at Legal@helpathome.com.

In addition, any suspected violations are to be referred to Ethics, Compliance and Privacy Department via email to Compliance@helpathome.com.





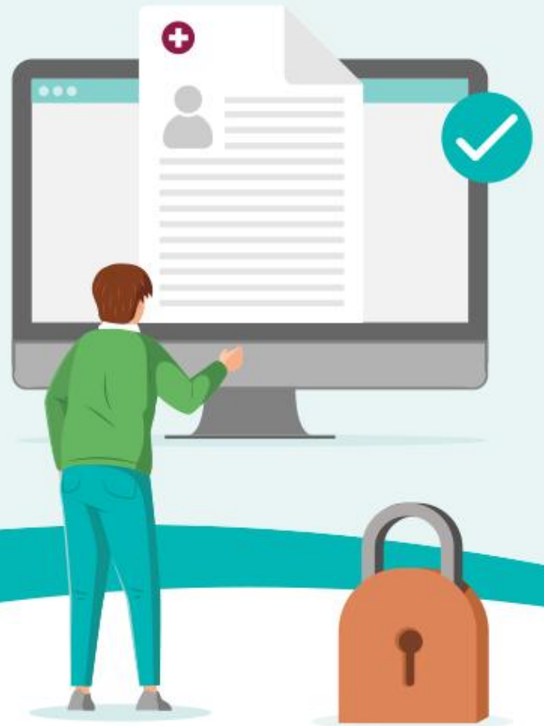
Reporting Compliance Concerns

HAH is built on integrity and making ethical decisions. Suppliers shall provide channels for their employees to report concerns or potentially unlawful activities within the workplace without consequences. Suppliers shall create an environment where concerns and/or reports will be treated in a confidential manner. Suppliers shall promptly investigate such reports properly and take corrective action if needed.

If there is reason to believe that this Supplier Code may have been violated, HAH encourages individuals to address their concerns. The HAH Ethics Helpline is accessible 24 hours a day by phone at 1-844-769-0288 or online via https://helpathome.navexone.com/ as well as Mobile at https://helpathome.navexone.com/. You may report anonymously if you wish. When you contact the Ethics Helpline, the information you provide is documented in detail and forwarded to the appropriate department within HAH for review and investigation.

Data Privacy, Confidentiality and Security

Suppliers shall comply with applicable privacy and data protections laws and regulations, as well as secure HAH confidential data and individual personal data. Suppliers shall also prohibit any unauthorized access or use of HAH confidential information including but not limited to records and related information for all HAH employees, affiliates, clients, or contractors. Breaches in confidentiality represents a failure to meet the professional and ethical standards expected by HAH of its Suppliers and is considered a violation of this Supplier Code. Suppliers shall report any suspected privacy and/or data breaches immediately to infosec@helpathome.com and compliance@helpathome.com



Privacy of Clients/ Patients Information

Our clients/patients trust us to keep their information confidential. This means we should share records or client/patient information only with authorized persons who have a legitimate need for the information. Suppliers must ensure that all de-identified protected health is not legible. Inappropriate use or disclosure of clients/patients information may be subject to investigations and disciplinary actions. Suppliers may not expose private information where it may be seen or taken by unauthorized persons. Only the minimum confidential health information may be shared which is necessary for the purpose. Suppliers are required to observe all HAH privacy and security rules regarding electronic and hard copy information. Suppliers should ensure that all client/patient information is secured from access by unauthorized individuals and notify supervisory staff of any suspicious individuals or behavior in their work areas.

All supplier's, contractor's and subcontractor's and vendor's must report any confirmed privacy/data breach within 24 hours or as reasonably possible to the Ethics, Compliance and Privacy Department or via email Compliance@helpathome.com during a business day.

Identity theft has become an increasing concern. It is important for all Suppliers who encounter or have a suspicion of identity theft to report the matter immediately to the Ethics, Compliance and Privacy Department or via email Compliance@helpathome.com or for anonymous reporting contact our Ethics Help Line at **1-844-769-0288**.



Fair Compensation

Suppliers shall conduct their business in line with fair competition and in accordance with all applicable laws, codes, and regulations. Suppliers shall refrain from unethical sales practices such as backdoor selling, making unattainable commitments, requesting competitor information, offering excessive valued gifts, or providing unfavorable pricing.

Human Rights to Work

HAH is dedicated to ensuring that fundamental human rights are not harmed through its procurement activities. Our commitment to human rights is reflected in our labor practices, diversity and inclusion, comprehensive discrimination and harassment policies, workplace health and safety. HAH expects that its Suppliers shall protect its employees from unfair, unethical, discriminatory, and unsafe working conditions. Further, Supplier shall not participate in bonded, forced, or child labor in any manner and shall protect its employees from unfair, unethical, discriminatory, and unsafe working conditions.





Supplier Diversity

HAH recognizes the value of diversity and actively encourages and supports a work environment that benefits from the skills and abilities of employees from a wide range of cultural values and traditions. HAH supports inclusion within supply chains and sees this as an integral part of our strategic sourcing and procurement processes. Suppliers shall be held accountable for providing opportunities to diverse subcontractors. Suppliers shall offer high-quality, competitively priced goods and services from a diverse range of subcontractors, as applicable. Suppliers are also encouraged to develop Supplier diversity programs of their own and are expected to report those to HAH, upon request.



Supply Chain Sustainability

HAH is committed to implementing and maintaining environmentally responsible business practices throughout its supply chain. HAH seeks Suppliers that share our commitment to diversity, sustainability, and making a positive impact in their communities. Suppliers are encouraged to implement systems and/or processes that minimize the impacts on the environment, the production process, and the end products themselves. Suppliers shall ensure that their facilities comply with environmental laws, including all applicable laws related to waste disposal, air emissions, discharges, toxic substances, and hazardous waste disposal.

Compliance with Laws and Regulations

HAH requires its Suppliers to understand and comply with all related Federal and State laws, regulations, and government guidelines. Suppliers shall also hold their subcontractors to the same compliance standards.

Deficit Reduction Act of 2005 (DRA)

It is important that suppliers, contractor's and vendor's know that the DRA was established to improve federal and state oversight and enforcement actions against fraud and abuse in the Medicaid program. It requires any entity receiving more than $5 million dollars in Medicaid funds per year must educate their workforce on the following: (1) the federal False Claims Act; (2) relevant state False Claims Acts; and (3) whistleblower protections.

1. **The Federal False Claims Act — the following are examples of non-compliance committed by Vendors:**
   a. Participating in kickbacks (payments or other types of compensation made in order to influence and gain profit from an individual or company;
   b. Providing services to a healthcare provider while ineligible to participate in federal health care programs due to suspension or debarment from such programs or because the vendor was convicted of a health care related crime;
   c. A conviction of filing false claims with state and/or federal agencies.

2. **State Laws**

   In most states, it is a crime to obtain something (e.g., such as Medicaid payment or benefit) based on false information. The states in which Suppliers, contractors and vendors conducts business and provide services have similar false claims acts. These laws apply not only to healthcare benefits paid through a state Medicaid program, but to a broad range of other state funded programs. These laws allow individuals to file a lawsuit in state court for false healthcare and other claims that were filed with the state for payment.

3. **Qui Tam "Whistle-blowers" Provisions**

   Individuals or Entities can come forward and report misconduct involving false claims, the False Claims Act's "whistle-blower" provision allows any person with evidence of fraud against federal programs or contracts to file a lawsuit on behalf of the government.

Sanctions (Ineligible Persons/Entities)

We initiate appropriate inquiries using exclusion databases prior to contracting with Suppliers.

HAH will not contract with, employ, or bill for services rendered by a person or an organization which has been excluded from or is ineligible to participate in government healthcare programs, or who has been convicted of a crime related to the provision of healthcare items or services.

In addition, HAH conducts screening of individuals/entities and suppliers to ensure those excluded and sanctioned under OIG List of Excluded Individuals/Entities are addressed appropriately. Other sources and lists may also be checked as HAH deems necessary and appropriate.

Suppliers, contractors, and vendors (including any suppliers, contractors, and vendors staff) must report within three (3) business days if they become excluded or otherwise ineligible for participation in a government healthcare program, or if they have been charged with, or convicted of, a crime involving the provision of healthcare items or services and has access to protected health information. If suppliers, contractors, and vendors are aware that they have been excluded please report it to Ethics, Compliance and Privacy Department at Compliance@helpathome.com.

Key Contacts

Help With	Contact	Contact Info
Questions or concerns about laws, our Code, supporting policies	Compliance Leader	**Compliance**@helpathome.com
To raise questions or concerns about legal matters and conflicts issues	Chief Legal Officer	**Legal**@helpathome.com
Privacy or confidentiality of client or employee information; HIPAA concerns	Privacy Inquiries	**Compliance**@helpathome.com
Technology concerns, including cybersecurity risks	Chief Information Officer	**IT**@helpathome.com
Questions or concerns about laws, our Code, supporting policies	Ethics and Compliance Inquiries	**Compliance**@helpathome.com
Questions or concerns relating to staff and clients/ patients incidents	Risk Management	**Riskmanagement**@helpathome.com
Human Resource concerns	Human Resources Department	**AskHR**@helpathome.com
Quality Care and Patient Safety concerns	Quality and Patient Safety	**Quality**@helpathome.com
Report IT Security concerns	IT Security Incident	**Infosec**@helpathome.com
Report any concern	Ethics Help Line	**1-844-769-0288** **Ethics Help Line Desktop/Mobile** **https://helpathome.navexone.com/**



Additional Resources

The Code does not cover every situation you may face on the job, so it is 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 may contact the Ethics, Compliance and Privacy department via email at Compliance@helpathome.com for policies and procedures or guidance.

Annual Compliance Training and Annual Acknowledgment

Suppliers shall receive annual compliance training. The annual compliance training can be provided by their own company as long as it meets Help at Home compliance standards. The supplier will provide acknowledgement or attest that they have completed annual compliance training as well as acknowledge their obligations of the Supplier Code of Conduct annually.

Supplier Acknowledgement

The attached Supplier Code of Conduct sets forth the standards required by our Suppliers when conducting business with or dealing with HAH.

By signing this Acknowledgement, the undersigned Supplier agrees that they have received, read, understood and will abide by Help at Home's Supplier Code of Conduct.

By signing and acknowledging, the undersigned Supplier agrees to notify the Ethics and Compliance department via email of any conflict-of-interest disclosure via email at Compliance@helpathome.com.

Supplier understands that its promise to comply with the Supplier Code of Conduct does not obligate HAH to conduct business, place orders or enter a formal contract with Supplier.

Company Name:

Representative: _____

Job Title: _____

Signature: _____

Date: _____