

CODE OF CONDUCT

INTEGRITY. RESPECT. INSPIRE.

Help at Home®

A Message from Our Chief Executive Officer



Dear Help at Home Employee:

Since our founding in 1975, our company has grown to be the country's largest personal home care provider. I am 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 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 Hocevar
Chief Executive Officer
Help at Home, LLC

Table of Contents

Mission, Vision Statement and Values... 4
Purpose of our Code of Ethics 4
Ethics and Compliance Program 4
Department of Ethics, Compliance and Privacy 5
Ethics and Compliance Training 5
Enterprise Ethics and Compliance Committee 6
Our Compliance Helpline Works 6
What is the Compliance Helpline? 6
Who may Utilize the Compliance Helpline? 6
What should be reported to the Helpline? 6
Reporting Compliance Concerns 7
Investigation of Helpline Reports 7
Non-Retaliation 7
Confidentiality, Privacy and Security 8
Privacy of Client/Patient Information 8
Organization Information and Media 10
Social Media Usage 10
Quality Client/Patient Care 10
Clients/Patient Abuse & Neglect 10
Clients/Patient Rights 10
Fraud Waste and Abuse 11
Sanctions Ineligible Persons/Entities 12
Recordkeeping 12
Safeguarding Company and Client/Patient Property 13
Workplace Health and Safety 13
Political Activity and Lobbying 13
Tobacco-Free Environment 14
Gifts and Entertainment 14
Conflicts of Interest 14
Dealing Honestly with Customers, Vendors and Consultants 15
Respect and Dignity in the Workplace 15
Solicitation and Distribution 16
Drug-Free Workplace 16
Anti-Kickback, Anti-Bribery and Anti-Corruption Laws 16
Anti-Money Laundering 17
Anti-Trust Laws 17
Marketing Laws 18
Suppliers 18
Competitors 18
Waivers to This Code 18
Open Door Policy 18
Staff and Vendor Identification 18
Background Check 19
Professional Licensure 19
Surveys and External Audits 19

We Give Back **20**
A Message From The Sr. Vice President of Ethics, Compliance & Privacy (Compliance Leader) **21**
Key HAH Contacts **22**
Additional Resources **23**
Statement of Understanding **24**

MISSION, VISION STATEMENTS AND VALUES

Help at Home's mission is to enable individuals to have Great Days with independence and dignity at home. Core to our services are highly trained, compassionate, and dependable Caregivers supported by our local teams and Field Support Center with the resources and expertise to deliver unsurpassed care. Our goal is to create Great Starts, Great Days, and Meaningful Moments for our associates and clients. Our vision is using the millions of hours we spend with our clients to establish the home as the center of health and care coordination. Serve our clients as if they are family and create meaningful moments that make a difference.

PURPOSE OF OUR CODE OF CONDUCT

We take pride in our Help at Home (HAH) Code of Conduct (Code) which is the foundation of our commitment to excellence and communicates our ethical business standards. Our code applies to all HAH Board of Directors, employees, healthcare professionals, agents, officers, directors, contractors, vendors and associates (non-employee individuals engaged to provide caregiving or support services), and any other person or organization engaged to provide products or services. The code provides guidance to all HAH colleagues on how to conduct our daily business with integrity. We make decisions about how to conduct ourselves every day as we go about our work. Each of us is accountable for the actions that we decide to take. At HAH, we are each stewards of the reputation we enjoy of ensuring ethical business practices and safe quality care. Accordingly, our Code serves as a cultural compass for board members, employees, management, contractors, vendors, and others who interact with the organization. It is an essential element of our Ethics, Compliance and Privacy Program. The Ethics, Compliance and Privacy Program is a partnership among all of us to make the right choice every time.

Everyone associated with the organization employees, healthcare professionals, agents, officers, directors, contractors, vendors and others who provide services or products is expected to promptly report any suspected violations of this Code, organizational policies, or applicable law.

Failure to follow the HAH Code, policies and procedures could result in disciplinary action up to and including possible termination.

ETHICS, COMPLIANCE AND PRIVACY PROGRAM

Help at Home has developed the Ethics, Compliance and Privacy Program which affirms and formalizes our commitment to ethical business practices. This commitment permeates all levels of the organization. Our Ethics, Compliance and Privacy program outlines what we do as an organization to comply with legal and ethical requirements and includes the following:

- Setting compliance standards and ethical conduct through written policies, procedures, and our Code of Conduct;

- Communicating standards through awareness, education, and training programs for everyone at the Organization;
  Conducting ongoing monitoring and auditing activities in areas of compliance risk;
  Providing a process for confidential reporting potential violations of laws, policies, or our Code of Conduct without fear of retaliation or retribution;
  Identifying, investigating, and responding to potential compliance problems;
  Performing routine sanctions checking to ensure we are not conducting our business with individuals and entities ineligible to participate in federal or state health care programs;
- Enforcing compliance standards and disciplining non-compliance actions;
- Maintaining an organizational structure that supports the furtherance of the Ethics, Compliance and Privacy Program, including establishment of the Enterprise Ethics and Compliance Committee, Compliance & Quality Committee of the Board of Directors and appointment of a Compliance Leader who oversees the Program's functions.

ETHICS, COMPLIANCE AND PRIVACY DEPARTMENT

The Ethics, Compliance and Privacy Department is charged with supporting Help at Home departments on providing guidance with developing policies, procedures and practices to ensure compliance with applicable laws and regulations; informing departments impacted by changes and updates in regulations; performing reviews and evaluations of all compliance matters at the organization; developing positive relationships with regulatory bodies, and ensuring that appropriate and timely information is provided to the Board of Directors and senior leadership regarding all aspects of the Compliance Program.

The Department coordinates multiple activities of the Ethics, Compliance and Privacy Program, including preparing and distributing this Code of Conduct, annual and special-purpose compliance training, chairing the leadership team's Enterprise Ethics and Compliance Committee, managing the Confidential Ethics Helpline program, generating monthly compliance updates, policy and procedure reviews/approvals, the privacy program and providing compliance information on the organizations intranet/portal, newsletters and elsewhere. Please contact the Compliance Leader at compliance@helpathome.com with any questions or concerns or for anonymous reporting contact our Ethics Help Line at 1-844-769-0288.

ETHICS AND COMPLIANCE TRAINING

Every employee receives Ethics and Compliance training including training on the Code of Conduct, during new employee "orientation" or within the first 30 days of the date of hire. During this training, each new employee will receive a copy of the Code of Conduct, participate in Code training, and complete an acknowledgement.

Each year we conduct Code "refresher" training for all of our employees, healthcare professionals and vendors. Compliance training is incorporated into the employee evaluation process. This training is mandatory for all employees, vendors and associates. The code is available in English and some other languages.

ENTERPRISE ETHICS AND COMPLIANCE COMMITTEE

The Ethics, Compliance and Privacy Program is supported and monitored by the Enterprise Ethics, Compliance and Committee. The Committee meets quarterly to review and discuss compliance information, including regulatory developments, departmental audits and reviews, compliance news, compliance risk assessments and reported incidents of non-compliance.

OUR EHICS HELPLINE WORKS

1-844-769-0288 (English & Spanish)

Online Website:
https://helpathome.navexone.com/
Mobile:
https://helpathome.navexone.com/
Ethics, Compliance and Privacy Department Email:
compliance@helpathome.com

What is the Ethics Helpline?

The Ethics Helpline is a simple way for HAH employees, staff, leaders, board members and vendors to confidentially report activities that may involve ethical violations or unlawful conduct at the organization. The Ethics Helpline is managed and operated by an independent third-party operator to ensure effective communication, integrity, and confidential reporting. It is available toll-free, 24 hours a day, seven days a week in the English and Spanish languages. If an alternate language is needed, the vendor will engage a translation service to ensure we are supporting the reporter. A trained operator takes each call, gathers the needed information, and ensures that the report is immediately sent to the Ethics, Compliance and Privacy Department for investigation and appropriate action.

Who May Utilize the Ethics Helpline?

The Ethics Helpline is available for use by any employee, leader, board member, healthcare professional, vendor or associate of the HAH. Everyone has a responsibility for reporting any activity that appears to violate applicable laws, rules, regulations, accreditation standards, HAH policy or this Code of Conduct.

What should be reported to the Ethics Helpline?

Users may call the Ethics Helpline to report suspected violations of the Code of Conduct, policies and regulations related to but not limited to:

- Fraud, Waste, Abuse and Exploitation
- Quality Care
- Conflicts of Interest
- Confidentiality, Privacy and Security of Health Information
- Identity Theft or Fraud
- Environmental Health and Safety Concerns
- Coding and Billing practices for client/patient care services
- Client/Patient abuse and mistreatment

- Client/Patient Rights and Choice
- Financial, Business and Professional Ethics
- Discrimination
- Retaliation concerns
- Ineligible Persons or Entities
- Gifts and Gratuities
- Social Media
- Workplace violence and safety

REPORTING COMPLIANCE CONCERNS

There are several options which an employee, leader, board member, vendor, healthcare professional or associate may use to report an anonymous compliance concern. An employee or associate has the choice to report any concerns to a supervisor, the ethics, compliance and privacy department via email, to the Compliance Leader, to call the confidential Ethics Help Line, or submit a report via EthicsPoint website.

All reports must be made in good faith. Appropriate disciplinary action will be taken if information has not been provided in good faith.

INVESTIGATION OF ETHICS HELPLINE REPORTS

All compliance concerns are investigated. Reports concerning matters outside of the Ethics, Compliance and Privacy Department's area (for example, Employee Relations) will be referred to the appropriate department for investigation. Callers are provided a report key number and may call back to check on the status of the concern or provide additional information. To protect your confidentiality and privacy, we do not disclose the details of the investigation or any disciplinary action. However, callers will be informed of whether the investigation is complete and if the issues were addressed. Investigation results are used to correct or prevent any future issues and improper behaviors revealed in the final report. Results of the investigations are shared with the Enterprise Ethics and Compliance Committee, leadership and the Board of Directors.

NON-RETALIATION

When someone raises a good faith concern, calls the ethics helpline, or cooperates with an investigation or corrective action, retaliation against that person is **not permitted**. HAH takes reports of retaliation seriously. If you feel that you have experienced retaliation immediately report it to the appropriate supervisor or manager who is not involved in the issues or contact the ethics and compliance department via email or the ethics helpline. Any allegation of retaliation, the allegation will be investigated, and appropriate steps will be taken to protect those who report retaliation.

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 are ever unsure about the right course of action.

For any additional guidance on this, you can send an email to AskHR@helpathome.com or file a concern via Ethics Helpline selecting guidance. 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 Employee Handbook and additional resources listed at the end of this document.

CONFIDENTIALITY, PRIVACY AND SECURITY

We protect the Privacy of Our Clients/Patients and the Confidentiality of Clients/Patients and Employee Information

Confidential information includes:

- Clients/Patients medical records;
- Billing and financial records;
- Employee records (including health records); and
- Sensitive business, proprietary and financial information of the organization, whether stored in electronic or "hard copy" format.

Employees must dispose of confidential information in "hard copy" form in the special, locked consoles of shredders, and must dispose of electronically-stored confidential information according to procedures set forth by the record retention policy.

Employees whose duties bring them into contact with electronically stored Client/Patient information are expected to observe all security rules regarding safeguarding confidential clients/patients information in electronic form. Approval is required for the use of portable electronic storage devices which use, store, or transmit Client/Patient records and other confidential information. Such devices must be secure at all times, and utilize software and other controls (e.g. encryption) methods approved by the organization's Chief Information Security Officer.

Information that is used by the organization is private and proprietary. This includes business strategies, costs, financial data, and other economic information.

Business information about the organization may not be disclosed to anyone outside of our organization; such disclosure may also violate federal and state law.

PRIVACY OF CLIENTS/PATIENTS INFORMATION

Help at Home workforce should share records or Client/Patient information only with authorized persons who have a legitimate need for the information.

Employees must ensure that all de-identified protected health information is not legible. Inappropriate use or disclosure of clients/patients information may be subject to investigations and disciplinary actions.

Conversations which concern our clients/patients must occur in a place that protects client/patient privacy and confidentiality. Employees 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.

Because HAH electronically transmits health information in connection with transactions for which the Department of Health and Human Services has adopted standards, Help at Home is a covered entity under the Health Insurance Portability and Accountability Act (HIPAA) and must protect the privacy and security of health information. The HIPAA Privacy Rule safeguards individuals' protected health information and sets rules for using and disclosing that information, while the HIPAA Security Rule protects health information in electronic form with technical and physical safeguards.

Employees may **never** share password or logon information. Users must sign off of electronic systems when not in use, and at the end of each working day. Electronic emails that seem suspicious employees are not to open or follow any links provided in the email. The employee must contact the Chief Information Security Officer and/or report it immediately via the ethics helpline. Employees 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.

Client/Patient intake forms and documents must be protected at all times and utilized as uses and disclosures for Treatment, Payment, and Healthcare Operations (TPO).

- Only a Care Giver or staff member that has a need to know may have access to Client/Patient information for disclosures relating to TPO, electronically or in hard copy.
- All Care Givers shall ensure the security of printed clients/patients records and electronic records at all times while transporting them from Client/Patient to Client/Patient visits.

Identity theft has become an increasing concern. It is important for all employees 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.

Requests for information concerning our Clients/Patients should be directed to the branch managers and/or direct supervisors in each market.

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 do not share them with anyone. • Log off, or lock the screen, of your computer or device when left unattended	**Don'ts:** • 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 is 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.

ORGANIZATION INFORMATION AND MEDIA

Only *authorized employees* may share or discuss organizational information with news media. All calls must be referred to the Public Relations Department at (502) 445-4126. Requests for information about an employee should be directed to the Human Resources Department via email ASKHR@helpathome.com, including requests for employment references and personnel information.

SOCIAL MEDIA USAGE

Help at Home expects that all employees and associates who use social media (such as Facebook®, Instagram®, Snapchat®, Twitter®, Tik Tok®, LinkedIn®, and similar services) will do so in accordance with applicable laws. No clients/patients information of any kind (including images), or confidential company information may be placed on social media sites for any reason.
Employees may not access personal social media accounts using the Help at Home network or e-mail system. Access to Social Media sites during work hours may only take place during an authorized break period and outside of clients/patients homes and not while providing care for a clients/patients. Unauthorized employees may not make statements on social media sites which are (or which may reasonably be seen to be) made on behalf of the company. Any employee or staff who violates the social media usage policy, may face disciplinary actions according to Help at Home progressive counseling policy.

QUALITY CLIENT/PATIENT CARE

Help at Home promotes high quality of care, clients/patients safety, and efficiency. Furthering HAH mission provides an opportunity for all employees to make a positive impact in the community.

Here are a few things we can do to improve the services we provide to our clients/patients:

- Arrive on time daily, be polite to client/patient and loved ones.
- Promote open lines of communication with client/patient
- Maintain a safe Client/Patient care environment.
- Inform clients/patients about their role in client/patient safety.
- Reporting of events that are not consistent with routine care or that result in real or potential client/patient injury.

CLIENT/PATIENT 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 Helpline immediately or email compliance@helpathome.com.

CLIENT/PATIENT RIGHTS

HAH believes that recognizing and respecting Client/Patient rights is an important aspect of care that encourages clients/patients to become more involved in and informed about their care. Care, treatment, and services should be provided in a way that respects and fosters the client's/patient's dignity, autonomy, positive self-regard, civil rights, and involvement in his or her care. HAH believes that care,

treatment, and services should also be carefully planned and provided with due regard to the client's/patient's personal values, beliefs, and preferences.

Care at HAH includes addressing processes and activities as they relate to client/patient rights by:

- Informing clients/patients of their rights and responsibilities
- Helping clients/patients understand and exercise their rights
- Respecting clients'/patients' values, beliefs, and preferences
- Informing clients/patients of their responsibilities regarding their care, treatment, and services

Some of the ways we meet standards of care related to client/patient rights include:

- Honoring the client's/patient's right to give or withhold informed consent
- Informing client's/patient's about advance directives
- Complying with end of life decisions made by client's/patient's and surrogates
- Respecting the client's/patient's right to receive information in a manner he or she understands.
- Providing a process to have complaints & grievances reviewed by HAH.
- Further, the company complies with Client's/Patient's Bill of Rights and Responsibilities

FRAUD, WASTE AND ABUSE

HAH is committed to full compliance with all federal, state, and local health care program requirements.

"Fraud" involves the making of a false statement in order to receive some benefit to which one is not entitled. "Waste" and "Abuse" include practices which directly or indirectly result in unnecessary costs to a government health care program or clients/patients. Examples of fraud, waste and abuse include:

- Billing for services or supplies which were not provided or furnished;
- Billing for excessive services or not medically necessary;
- Falsifying medical records and/or documents;
- Altering claims forms or receipts in order to receive higher payments;
- Duplicate billing to the government payors and the clients/patients or another insurer; and
- Offering, paying, soliciting, or receiving bribes, kickbacks, or rebates, directly or indirectly, to induce referrals of clients/patients or the purchase of goods or services paid for by government health care programs.
- Any exploitation of clients/patients

HAH expects that all individuals associated with the organization will avoid fraudulent, wasteful or abusive practices and promptly report it to Ethics, Compliance and Privacy department via email compliance@helpathome.com these practices when they occur or for anonymous reporting contact our Ethics Help Line at 1-844-769-0288.

Fraud and abuse may be subject to state and federal laws and can result in reporting to adult protection services, child protection services, law-enforcement entities, Medicaid agencies, payors including Office of Inspector General. Such cases can also result in exclusion of individuals or institutions from participation in government health care programs. Fraud and abuse guidelines state that we must:

- Provide only those services that are documented as being medically necessary.
- Document accurately, timely and completely the services that we provide.

- Perform complete, accurate and consistent coding of medical records in accordance with regulatory requirements and guidelines. (i.e. place of service, extra visit hour(s))
- Report all costs according to generally accepted accounting practices and according to Company policy.
- Maintain internal accounting controls.
- Maintain accurate billing to government payers, managed care payers, commercial insurance, and clients/patients, as well as conform to pertinent Federal and state laws and regulations.

SANCTIONS (INELIGIBLE PERSONS/ENTITIES)

We initiate appropriate inquiries against exclusion databases prior to hiring.

HAH will not contract with, employ, or bill for services rendered by a person or 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 monthly screening of employees/care givers and vendors to ensure excluded individuals are addressed appropriately.

Employees, care givers, contractors, and vendors must report 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.

RECORDKEEPING

Help at Home maintains and receives many types of records. These may include medical records, documents, Client/Patient billing and financial records and electronic information. State and federal regulations impose specific requirements for keeping and destroying specific types of records. Because departments and branch locations maintain various types of records, please take the time to become familiar with document retention policy that apply to the documents which your department and/or branch locations uses, manages or creates.

A few rules that apply broadly:

- Do not falsify facts or make false record entries.
- Do not remove any company files or documents from the premises.
- Do not falsify clients/patients signatures on time sheets or any document.
- Keep records confidential.
- Maintain and destroy records according to the record retention policy.
- Give records only to those people who are authorized by policy and regulatory requirements to have access.

SAFEGUARDING COMPANY AND CLIENT/PATIENT PROPERTY

All employees and associates are expected to use Company property and resources responsibly and only for an appropriate purpose.

HAH property may not be used for non-company purposes without written permission. Company time, facilities, or equipment may not be used for unapproved purposes. Ask your supervisor if you have any questions about proper use of Company property and resources.

It is important that Client/Patient property valuables are safeguarded against fraud, waste, and abuse. Employees/care givers should be respectful of Client/Patient valuables in their home.

WORKPLACE HEALTH AND SAFETY

We Maintain and Promote a Safe & Healthy Workplace

Do your part:

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

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.
- Follow policies and procedures applicable to your branch location.

Immediately report all incidents and accidents involving staff, Client/Patient, equipment and property by completing an incident report in Riskonnect or by contacting Risk Management via email at Riskonnect@helpathome.com.

POLITICAL ACTIVITY AND LOBBYING

Help at Home advocates for legislative issues that affect the Company. Political contributions are highly regulated, and in many jurisdictions corporate political contributions are prohibited or limited. Company employees are free to support political campaigns or issues outside of their duties at Help at Home. However, employees are expected to ensure that private political activities are not carried on in such a way as to suggest endorsement by the organization.

TOBACCO-FREE ENVIRONMENT

It is the policy of the Company to educate staff and the public at large about the hazards of smoking and tobacco use and to provide smoking cessation assistance. As a health care provider and as an employer the Company is committed to providing clients/patients and staff with an environment that promotes healthy behaviors. For this reason, all Help at Home office locations are Tobacco Free. All individuals that perform health care services at Client/Patient homes are prohibited from using any tobacco products of any kind (including electronic cigarettes).

GIFTS AND ENTERTAINMENT

It is inappropriate for employees to give or receive, 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 your supervisor before accepting a gift of any kind.

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.

Never request or accept gifts from a Client/Patient in exchange for services. If someone offers you cash, do not take it. If they insist, notify your supervisor or manager.

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.

CONFLICTS OF INTEREST

Employees and associates of the Company sometimes have personal or financial interests which make it inappropriate for those persons to be involved in certain activities and transactions of the Company. These situations are called “conflicts of interest.” Here are two examples of what may be considered a conflict of interest:

- A situation in which an employee or associate (or a member of that employee or associate’s family) is employed by or has a financial interest in a company that does business with Help at Home.
- A situation in which a Help at Home employee or associate also works part-time for a Help at Home vendor, competitor, supplier, or client/patient.

It is extremely important that any employee or associate of the Company promptly disclose any actual or potential conflict of interest to a supervisor. Questions/Guidance concerning conflicts of interest may also be directed to the Ethics, Compliance and Privacy Department via email

Compliance@helpathome.com or for anonymous reporting contact our Ethics Help Line at 1-844-769-0288.

DEALING HONESTLY WITH CUSTOMERS, VENDORS/SUPPLIERS AND CONSULTANTS

Showing respect for our clients/patients, guests and business associates requires that we only make statements that we know are honest and accurate. Written documents should be prepared in a timely manner. All business information, records and reports should be complete, accurate and truthful.

It is important that we abide by trademark and copyright laws, as well as all licensing requirements. Should you have any questions relating to these laws and requirements, contact the Legal Department.

We support ethical business behavior by properly representing ourselves to the public. In order to effectively control both internal and external printed materials, all proposed printed material to be used by any Company department and/or shared with any outside audience must be presented to the Head of Public Relations at (502) 445-4126 for consultation and approval prior to production.

RESPECT AND DIGNITY IN THE WORKPLACE

It is the policy of the Company to maintain a work environment free from all forms of unlawful harassment. Comments or conduct relating to age, race, creed, color, national origin, sex, religion, veteran status, disability, marital status, sexual orientation, or any other classification protected by federal, state, or local laws will not be tolerated. Employees, clients/patients, and visitors are to be treated with dignity, respect, and courtesy.

Sexual harassment is a violation of the law and will not be tolerated or condoned. This behavior is defined as unwanted sexual advances, requests for sexual favors and all other verbal or physical conduct of a sexual nature, especially where it:

- Becomes a term or condition of employment.
- Is used to make decisions affecting someone's job.
- Creates an intimidating, hostile, or offensive work environment.

Sexual harassment also includes comments, jokes, suggestions, sexually oriented statements or other remarks or actions that are offensive.

Behavior such as intimidation, verbal or physical abuse, sexual misconduct, or the creation of a hostile or offensive work environment will not be tolerated. Individuals working at all levels of the Company, including management, clinical and administrative staff, licensed independent practitioners, and governing body members are expected to conduct themselves in a professional manner so that the workplace is free from behaviors that could have a negative impact on Client/Patient safety.

The Company will do everything possible to prevent discrimination and harassment of any kind. All of us have the right to work in an environment of mutual respect and professionalism. Please report any activities involving discrimination or harassment to your supervisor, manager, the Human Resources department via email AskHR@helpathome.com or the Ethics Helpline at 1-844-769-0288.

SOLICITATION AND DISTRIBUTION

Help at Home is committed to the care of our clients/patients. As part of that commitment, we do not solicit or distribute any literature or products for sale, or engage in private employment arrangements, on Company premises or with clients/patients.

"No Solicitation Distribution" includes, but is not limited to, handing out, dispensing, selling, or requesting another person to take, acknowledge or buy materials, literature, goods, or items. Employees may not solicit clients/patients or visitors for any cause or for private employment arrangements. Personal items or notices from any source other than from HAH may not be posted on Company bulletin boards. Items that promote any organization or commercial entity, political ideology, religious, or other cause, or which include messages or slogans that may disturb clients/patients or otherwise interfere with Client/Patient care services may not be displayed.

DRUG-FREE WORKPLACE

It is the policy of the Company to foster an environment of zero tolerance for the unlawful manufacture, distribution, dispensing, possession, or use of alcohol, controlled substances, or illegal drugs in the workplace.

ANTI-KICKBACK, 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, and related programs.).
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.

We expect our employees, officers, and directors to refrain from any conduct that may violate federal and state laws governing Client/Patient 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.

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

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, 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.

ANTI-MONEY LAUNDERING

Help at Home has designed it operations to ensure that our Caregivers, Employees, facilities, and services will be used only for legitimate purposes. We are committed to fully complying with all applicable anti-money laundering and terrorist finance laws, rules, and regulations. You must not participate in or facilitate money laundering; doing so, even unintentionally, could result in civil and criminal penalties against you and Help at Home.

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. You 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 yourself 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; or (5) 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 Legal Department. In addition, any suspected violations are to be referred to the Legal Department.

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 potential 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. If you are unsure whether a statement may violate an applicable law or regulation, you must refrain from making such statement.

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 and contractors who conduct business on our behalf will operate ethically and in compliance with the law. In furtherance of this objective we have adopted a Supplier Code of Ethical Business Conduct applicable to all suppliers/vendors.

COMPETITORS

It is okay to gather information about our competitors and their customers, suppliers, and vendors, provided we do so legally and ethically. Use good judgment; never induce or coerce others to provide you information and gather information from public sources and customer feedback and document the source of the information.

WAIVERS TO THIS CODE

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

OPEN DOOR POLICY

In an effort to create and foster better communication across the company, we have implemented an open-door policy than can help all employees to speak their minds about the workplace issues. It fosters support and value for the employees, boost morale and ultimately increases productivity. Employees should always first bring up their concerns within their own chain of command before taking it to the Ethics, Compliance and Privacy Department.

STAFF AND VENDOR IDENTIFICATION

All Caregivers and Staff should identify themselves to clients/patients prior to providing home care or any health care services. Staff and/or Vendor identification may be produced by wearing a badge ID or other forms of identification. All Vendors accessing any of HAH facilities or branch locations should identify themselves accordingly, vendors should be accompanied by a HAH employee or staff member while on HAH facilities.

BACKGROUND CHECK

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 federal, 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 is 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 status of their licensure or credentials and comply with all federal and state requirements for their professional discipline.

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.

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 Ethics, Compliance and Privacy Department at Compliance@helpathome.com or for anonymous reporting contact our Ethics Help Line at 1-844-769-0288.

WE GIVE BACK

We support various organizations, including the Help at Home Foundation, 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@helpathome.com or for anonymous reporting contact our Ethics Help Line at 1-844-769-0288.

A Message From The Compliance Leader

The Ethics, Compliance and Privacy program is our blueprint for ensuring that we operate with honesty, transparency, and integrity.

We are all entrusted to make decisions daily that impact our reputation and relationships with each other, our clients/patients, our staff, our leaders, our board of directors and our communities.

You are *Empowered*
You have a *Responsibility*
You have a *Voice*
You *Matter*
Speak Up

If you have any questions about what you think may be questionable activity taking place at Help at Home, please speak to your direct supervisor, contact the ethics & compliance department via email: Compliance@helpathome.com, call the Compliance Helpline at 1-844-769-0288 or online via https://helpathome.navexone.com . The ethics helpline is anonymous, so we encourage you to speak frankly about your concerns. You will not be subject to any retaliation for your use of the Ethics and Compliance Helpline.

On behalf of our Board of Directors, Management team and me, please accept our heartfelt thanks for your commitment to excellence and for sharing our goal to provide high quality care throughout our communities with dignity, integrity and respect. Maintaining high standards of excellence is an essential element in assuring that Help at Home remains an outstanding home health/home care delivery system. When we work as a team and do our jobs ethically to the best of our ability, everyone wins – clients/patients, employees, and our communities.

Sincerely,
Chief Compliance Officer

Key HAH Contacts

Contact:	For help with:	Contact information:
Ethics, Compliance and Privacy Department	Questions or concerns about laws, our Code, supporting policies	compliance@helpathome.com
Legal Department	To raise questions or concerns about legal matters and conflicts issues	legal@helpathome.com
Information Technology Department	Technology concerns, including cybersecurity risks	it@helpathome.com
Risk Management Department	Questions or concerns relating to staff and Client/Patient incidents	riskmanagement@helpathome.com
The Human Resources Department	Human Resource concerns	AskHR@helpathome.com
Quality & Patient Safety	Quality Care & Patient Safety Concerns	quality@helpathome.com
IT Security Incident	To report IT Security concerns	infosec@helpathome.com
Ethics Helpline	To report any concern	1-844-769-0288 **Ethics Helpline Website:** https://helpathome.navexone.com/ **Ethics Helpline Mobile:** https://helpathome.navexone.com/

Additional Resources

You also should be aware of the following resources that are available 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

Ethics Helpline
by phone at 1-844-769-0288 or
Online via https://helpathome.navexone.com/
and
Mobile https://helpathome.navexone.com/

Accessible 24 hours a day

STATEMENT OF UNDERSTANDING

AND COMPLIANCE WITH

ETHICS, COMPLIANCE AND PRIVACY PROGRAM

Print Name: _____Branch Location/State: _____

I have read the Help at Home Code of Conduct. I understand what is expected of me, and I promise to comply with my responsibilities under the Code.

I hereby certify that I will adhere to the Code of Ethics with the requirements of the Ethics, Compliance and Privacy Program. I understand that I am obligated to report any violations that I have or may become aware of. I acknowledge that failure to fulfill this obligation during my time with the company may lead to disciplinary action, including possible termination.

I understand that if I violate this Code of Conduct, I may be subject to disciplinary action by Help at Home, up to possible termination of employment or the revocation of my contractual or other relationship with the Company.

I certify that I have not been charged with, convicted of, or entered a plea of no contest in connection with any criminal offense that was in any way related to health care. I have not been listed by a federal and/or state agency as debarred, excluded or otherwise ineligible for participation in any federally funded healthcare program or federal and/or state contracting. I will promptly notify the Company if I am debarred, excluded, or suspended from participation in any governmental healthcare program, or if I am charged with or convicted of any conduct which may result in debarment, exclusion, or suspension.

Signature

_____

Date

_____

This form must be completed, electronically acknowledged and/or signed and placed in your electronic employee file in the Human Resources Department.