KENDAL at Lexington

CODE OF CONDUCT

Code of Conduct

Kendal at Lexington is a Continuing Care Retirement Community licensed under the laws of Virginia to provide services to individuals living in our community. As a part of our team, you must follow our Compliance and Ethics Program and the Code of Conduct. Our team includes individuals who provide care and services throughout the organization as well as those who support our work through contracts and other agreements. Senior living communities like ours must follow many rules and regulations from both the state and federal governments. This Code of Conduct will help you understand how your actions must align with this wide range of rules as a team. We can ensure that we provide the highest level of care and services and prevent fraud, waste, and abuse.

Our Compliance Officer is Karla Dreisbach. The Compliance Official at Kendal at Lexington Community is Noelle Guill.

From the CEO and Board

Friends,

At Kendal at Lexington, we have a long tradition of providing healthcare services to older adults, guided by Kendal's Values and Practices. Central to that approach is our commitment to ethical and thoughtful decision-making, which shapes how we serve our residents and work with one another.

Healthcare operations are continually changing, shaped by numerous laws and regulations. Our commitment to meeting these requirements is supported by our Compliance and Ethics Program, whose foundation is our Code of Conduct. The Code reflects our shared commitment to values-based care and serves as a clear statement of the principles that guide our decisions each day.

The Code of Conduct does not replace each person's responsibility to make wise, fair, and honest decisions. Rather, it explains our personal and organizational responsibilities and identifies the areas where improper or unwise decisions can harm our organization.

We value your contributions to our residents and appreciate your support in maintaining an ethical workplace. Your commitment to honesty and integrity reflects our shared values, and as a member of our team, you play an important role in protecting our work environment and its compliance with applicable laws and regulations.

Thank you for your commitment and your contributions to our mission, our values, and, most importantly, to our residents.

Sincerely,

CEO, Adam Day and Kendal at Lexington Board of Directors

Introduction

Our **Code of Conduct** is a guide to appropriate workplace behavior. Refer to this guide whenever you are unsure of how to make the right decision or how to respond to a situation. Employees and individuals all share a commitment to legal, ethical, and professional conduct in the workplace. This Code of Conduct is one of three documents that guide our work. For more detailed information, you can read the **Compliance Plan** and the **Compliance Policies and Procedures**. The Compliance Plan and Code of Conduct include the federal, state, and local laws we must follow.

Our Responsibilities

As part of our team, we each share a responsibility and commitment to our residents, their families and each other.

As part of your commitment to our team, it's important that you always make legal and ethical decisions. Additionally, if you see anyone else on the team violating the Code of Conduct, it's your responsibility to report those violations to the compliance officer and official.

Reporting violations of the Code of Conduct is not optional. **You must report anything you see that may be unethical, illegal, or unprofessional.** Our reporting process includes several ways for you to share any concerns you may identify.

The Reporting Process

You may always call the Compliance Line at 800-211-2713 or file a report at [insert name].

- Report to a supervisor. They are most familiar with the laws, regulations, and policies that relate to your work.
- Report to a member of the leadership team, seeking out another or someone from human resources.
- Contact the Compliance Official, a member of the Compliance Committee, or the Compliance Officer.

- Call the toll-free compliance line which is available 24/7.
- Scan the QR code which links to the compliance line portal.

Compliance Hotline- 800-211-2713.

All reports to the Compliance Line are confidential, and you may choose to report *ANONYMOUSLY*.

The Compliance Line is available 24 hours a day, 7 days a week, for callers to report compliance-related issues. Concerns that are reported to the Compliance Line are taken seriously. Our culture is to ensure that there is no retaliation for bringing issues forward.

You can make calls to the Compliance Line without fear of reprisal, retaliation, or punishment for your actions taken in good faith. Anyone, including a supervisor who retaliates against an individual or entity for contacting the Compliance Line or reporting a compliance issue in any other manner, will be disciplined.

Resident-Centered Care and Rights

The **foundation for good quality of care and quality of life** is understanding and honoring resident rights. As we provide care, it is important to respect residents' rights. This includes:

- Always treating residents equally and in respectful ways, preserving their dignity, autonomy, self-esteem, and civil rights.
- Protecting resident privacy and confidentiality, particularly with regard to medical, financial, or personal information as required by HIPAA
- Respecting and protecting the personal property and money of all residents from loss, theft, improper use, and damage.
- Ensuring that residents and their legal representatives understand and participate in decisions about their care and treatment.
- Protecting every resident from physical, emotional, verbal, sexual or mental abuse or neglect. Any team member who abuses or neglects a resident can be terminated.

If you witness any form of abuse, you must report it immediately to your supervisor.

Kendal at Lexington will not tolerate any type of resident abuse or neglect at any time.

- Providing the individual needs of our residents and developing care plans based upon their assessed needs.
- Monitoring our services to ensure that our residents receive quality services through Quality Assurance and QAPI.
- Assuring that our staff is qualified with appropriate licenses and experience.
- Maintaining our policies, procedures, and practices are current and in line with the rules and laws we need to follow.
- Completing accurate and timely documentation and billing for the services provided.

Professional Responsibilities

As an employer, we promise to follow **fair employment practices** when hiring, screening, and evaluating our employees. Federal, state, and local laws guide our employment practices and provide us with a roadmap to compliance.

To keep residents safe, we screen all employees against various databases as required by law. As long as you work here, you must immediately tell your supervisor if any of your actions inside or outside of work might affect your employment. You must report any arrests or indictments, convictions, revocation of professional licenses, exclusions, or anything else that might prevent you from working at a healthcare organization.

The professional, responsible, and ethical behavior of every team member reflects directly on our reputation. As a team member, you must strive to make decisions that are honest and professional every day.

If you are a team member with a **professional license**, it's your responsibility to ensure you follow all applicable licensing, credentialing, and certification requirements and keep it current and in good standing.

We will not tolerate any form of **sexual harassment or violence** in the workplace. Additionally, team members may not supervise or be supervised by anyone with whom they have a close personal relationship.

You must follow our safety protocols that are here to protect you and the residents, including but not limited to our emergency plans, hazardous materials, and environmental policies. Let your supervisor know of any potential hazards immediately.

Safety in the workplace includes refraining from using any substances that impair your ability to do your job. You may never use, sell, or bring alcohol, illegal drugs, and/or narcotics on our property. You may never come to work under the influence of alcohol or illegal drugs. We have the right to screen and discipline any employee suspected of violating the drug and alcohol policy.

Governance and Oversight

We are committed to ensuring our organization remains in **compliance** with all applicable federal and state laws. As a team member, you must also help our organization always remain in good standing with regard to our business practices.

During the course of your job, you may have access to confidential and proprietary information. **Proprietary information** is any information an organization creates or owns, such as policies and procedures, compensation, or marketing and advertising plans. Confidential or proprietary information should not be shared with anyone outside Kendal at Lexington without prior permission.

Team members may not accept any **tips, gratuity, or gifts** from residents, possible residents or their family. Likewise, you may not give residents gifts. Gifts include any business or professional courtesy, including entertainment. Any goods or services totaling $50 per year is a gift. Staff may not work for residents.

Team members must always avoid conflicts of interest. A conflict of interest is when your personal interests may interfere with your ability to make good decisions for Kendal at Lexington. If you are unsure if a situation or relationship is a conflict of interest, talk with your supervisor.

Throughout the course of your job, you may use our **computers systems and networks**. You should have **no expectation of privacy** while using our computers systems and using them improperly or illegally is a violation of the Code of Conduct. When using your work computer to create documents, records, emails, medical records, billing records, and financial records, team members must never falsify or alter any document in an illegal or unethical way.

We use **marketing and advertising** to educate the public about our community services, activities, and opportunities. All marketing and advertising materials are truthful and informative and are designed to be honest and accurate. Team members and individuals often have **relationships** with other healthcare providers and referral sources. All relationships with these professionals must be open, honest, and legal.

We are required to follow many federal, state, and local laws, often subject to change. Management will communicate these changes when they occur and educate employees and individuals as needed. It's your job to read these **updates,** so you always have the most current information.

We are committed to **ethical and honest billing practices**. All team members must make truthful, accurate, and complete statements and submissions for billing. We have zero tolerance for false or inaccurate coding or billing. Any team member who knowingly submits a false claim or provides information that could result in a false claim may be disciplined up to and including termination. Additionally, if you witness or suspect another employee or individual member of making false billing claims, you must report the activity to your supervisor or the compliance office and official.

We will take **disciplinary action** against a team member who violates this Code of Conduct, the Compliance and Ethics Program, the supporting policies and procedures, and applicable federal, state, and local laws. Disciplinary action could come in the form of termination of employment or business relationships, civil penalties, and/or criminal investigation. We may also initiate disciplinary action against any employee who **retaliates** against another employee following the Code of Conduct and applicable laws.

You are valued here. We trust you to always make ethical and honest decisions during your employment. If ever you have a question about compliance or ethics in your decision making, please discuss the issue with your immediate supervisor or our compliance officer and official.

The Compliance and Ethics Program is critical to our continued success. The Code of Conduct and the Compliance and Ethics Program set standards for our legal, professional, and ethical conduct. Some key points to remember are:

- We are committed to personal and organizational integrity, acting in good faith, and being accountable for our actions.
- The Code of Conduct and the Compliance and Ethics Program prepare us to deal with the growing complexity of the ethical, professional, and legal requirements governing healthcare in the CCRC environment.
- The Compliance and Ethics Program is an ongoing initiative designed to foster a supportive work environment, provide standards for clinical and business conduct, and offer education and training opportunities for team members.

The success of the Compliance Program depends on our commitment to act with integrity, both personally and as an organization. As a team member, your duty is to ensure that you are doing everything practical to comply with applicable laws. You are expected to satisfy this duty by performing your responsibilities in accordance with professional standards, the regulations guiding our business practices, and our policies and procedures.

Your Compliance Official

Noelle Guill

540-464-2630

Your Compliance Officer

Karla Dreisbach, CHC, CHPC, CCEP

AQORD Compliance Collaborative

215-646-0720