



St. Ann's Community

Code of Ethical Conduct

Introduction

The St. Ann's Community Code of Ethical Conduct has been developed to assist you with decisions and situations that may arise at the workplace. We are confident that all our employees and volunteers, in addition to adhering to the Code of Ethical Conduct, will consistently strive to maintain personal standards of integrity and morality. We are committed to maintaining a highly ethical workforce and believe that this Code will assist us in doing so.

This Code of Ethical Conduct provides a broad overview of expectations of all our employees and volunteers. St Ann's has an 'Expected Behaviors Document' that is reviewed with and signed by each employee and volunteer. Each department within St. Ann's Community may have specific policies and procedures. The 'Expected Behaviors Document' along with those policies and procedures set forth the expectations of each employee. These are available from your manager or supervisor for your review.

The St. Ann's Community Code of Ethical Conduct is an integral part of the St. Ann's Community Corporate Compliance Program, which is incorporated by reference. The Corporate Compliance Program is designed to help all of us at St. Ann's Community to abide by the laws and regulations governing our operations. For example, the Corporate Compliance Program is designed to guide us in observing the requirements of Medicare, Medicaid, and other government health care programs, as well as with the requirements of the New York State Department of Health.

All employees and volunteers of St. Ann's Community, without exception, must observe and follow the Code of Ethical Conduct. Any violation of the Code of Ethical Conduct may result in disciplinary action, as outlined in the Discipline section of our Corporate Compliance Program. In addition, an employee or volunteer with knowledge of a violation of the Code of Ethical Conduct is obligated to report that violation. St. Ann's Community is committed to, and will make every attempt, to protect the anonymity of any individual who, in good faith, reports a violation or an incident of unethical behavior.

Please take some time to carefully review the Code of Ethical Conduct and the Corporate Compliance Program. If you have any questions, contact the VP of Organizational Development or the Corporate Compliance Officer.

St. Ann's Community Mission, Vision, and Values

Our Code of Ethical Conduct works in conjunction with the St. Ann's Community mission, vision, values, and goals adopted by St. Ann's Community Board. All employees and volunteers are

expected to join St. Ann's Community in its commitment to uphold the following mission, vision, and values:

Mission: St. Ann's Community promotes the highest levels of independence, physical and spiritual well-being of seniors in the Catholic tradition of excellence in care and services.

Vision: St. Ann's Community will be the provider and employer of choice for comprehensive senior services.

Value: Customer Satisfaction, Partnership, Leadership, Community Contribution, Spirituality and Team Engagement.

Personal and Professional Conduct

St. Ann's Community expects all employees and volunteers to conduct themselves in a manner that does not interfere with the rights and general welfare of residents/patients, other employees, volunteers, and visitors. Conduct that is illegal, unethical, unprofessional, or harmful will result in disciplinary action, up to and including termination. St. Ann's reserves the right to determine when and what discipline is appropriate.

St. Ann's Community expects all employees:

1. To know and follow the Expected Behaviors Document.
2. Be knowledgeable of, observe, and actively participate in the St. Ann's Community Corporate Compliance Program.
3. Report any actual or suspected violations to your supervisor or leave a message on the confidential "Hot Line" at (585) 697-6777, per the direction of the Corporate Compliance Program.
4. Hold strictly confidential and vigilant guard against the unauthorized disclosure or use of protected health information pertaining to residents/patients.
5. Observe all policies, procedures, and regulations.
6. Perform all work and work tasks assigned by his/her supervisor to the best of his/her ability.

Conflict Resolution

Job-related misunderstandings, conflicts or complaints may occasionally arise. Some. Examples of Conflict of Interests are:

- a. Accepting gratuities or special favors from a company or business that St. Ann's is doing business with.
- b. Recommending that St. Ann's do business with a company that you and/or a family member have a financial interest in and not disclosing this information to St. Ann's.
- c. Using St. Ann's resources (including equipment, supplies, services, or facilities) for personal benefit or the benefit of others unless otherwise allowed by law.

Work Environment

St. Ann's Community is committed to maintaining a safe, accessible, secure, and healthy environment. Employees and volunteers are expected to observe all health and safety requirements.

Legal Responsibilities

St. Ann's Community and its employees and volunteers are expected to comply with all laws and regulations of the United States, New York State, and local government. All employees are accountable for their actions, and for violations of St. Ann's Community's policies and procedures.

Conflicts of Interest

St. Ann's Community recognizes the rights of its employees and volunteers to engage in outside financial or business activities if those activities do not interfere or conflict with his/her performance or his/her responsibilities to St. Ann's Community. If a potential or perceived conflict of interest does exist, it needs to be disclosed. For further clarification, please see your supervisor, the VP of Organizational Development, or the Corporate Compliance Officer.

Use of Assets

The assets of St. Ann's Community are held in trust for the benefit of the people and community St. Ann's Community serves. As a result, no asset of St. Ann's Community may be used for personal benefit. It may not be used for personal benefit, sold, or loaned without proper authorization.

Privacy and Confidentiality

Employees: All employee records and files are the property of St. Ann's Community and are controlled by the VP of Organizational Development. A review of your personnel file can be requested by contacting the Human Resources department.

Residents/Patients: All resident/patient medical records are protected by HIPAA and the Privacy Act. Refer to St. Ann's Community's HIPAA and HITECH Policies and Procedures; HI-08.

Marketing and Communications: St. Ann's Community marketing and communications shall present information that is truthful, accurate, fair, and avoids misrepresentation of important data. All official communications of St. Ann's Community are to be issued through the Marketing department or the CEO's Office.