


# CARDON

## CODE OF CONDUCT



CARDON   
& ASSOCIATES INC.

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mission:

TO BE THE LEADING PROVIDER OF  
inspired living and compassionate care  
TO THOSE WE SERVE.

Dear CarDon Team Member,

First and foremost, we want to thank you for choosing CarDon as a place to share your passion and talents. Each member of our team, including yourself, is essential to achieve our mission “*To be the Leading Provider of Inspired Living and Compassionate Care to those we serve,*” through teamwork that is based on integrity, ethical behavior, respect, and professionalism.

Our Code of Conduct supports CarDon’s commitment to a team that works together to creatively solve problems. We encourage a culture of safety by showing respect and empathy, so everyone feels free to raise concerns and share their point of view.

The foundation of our culture of integrity is built on four pillars of honesty, trustworthiness, ethical behavior, and professionalism, which ensure we provide exceptional care and services in our communities.

***Honesty*** – truthful, open, fair, and consistent

***Trustworthiness*** – genuine, compassionate, empathetic, and reliable

***Ethical Behavior*** – honorable, principled, conscientious, and respectable

***Professionalism*** – appearance, competence, thoroughness, and dedication

Our Code of Conduct encourages each associate, contractor, vendor, volunteer, or other stakeholder to think about their actions and behavior in the workplace and the consequences of failing to act in accordance with ethical and compliance standards.

Together, we will take exceptional care of our residents, their families, and each other. We will achieve a level of excellence unprecedented in our industry. And we will provide a home where our residents may not love to live but they can live a life they love.

Sincerely,



Kent Rodgers  
President and Chief Executive Officer

# TABLE OF CONTENTS

| TOPIC   | PAGE NO. |
|---|----------|
| I. INTRODUCTION                                   | 1        |
| II. WHO WE ARE                                    | 1        |
| III. QUALITY OF CARE AND SERVICES                 | 2        |
| IV. RESIDENTS AND RESIDENT RIGHTS                 | 2        |
| V. ELDER JUSTICE ACT                              | 3        |
| VI. CONFIDENTIALITY AND PRIVACY                   | 4        |
| VII. DISCRIMINATION AND HARASSMENT FREE WORKPLACE | 6        |
| VIII. ACCURATE AND HONEST BILLING                 | 7        |
| IX. DOCUMENTATION                                 | 8        |
| X. RECORD RETENTION AND DESSTRUCTION              | 8        |
| XI. PROTECTION OF ASSETS AND RESOURCES            | 8        |
| XII. KICKBACKS AND REFERRALS                      | 8        |
| XIII. GIFTS                                       | 9        |
| XIV. CHARITABLE AND POLITICAL ACTIVITIES          | 9        |
| XV. CONFLICT OF INTEREST                          | 10       |
| XVI. CONTRACTORS AND VENDORS                      | 10       |
| XVII. EXCLUSIONS SCREENING AND MONITORING         | 10       |
| XVIII. LICENSURE AND CERTIFICATION                | 11       |
| XIX. WHISTLEBLOWER                                | 11       |
| XX. GOVERNMENT INVESTIGATIONS AND SURVEYS         | 12       |
| XXI. MEDIA RELATIONS AND SOCIAL MEDIA             | 12       |
| XXII. EDUCATION AND TRAINING                      | 13       |
| XXIII. RESPONSIBILITY TO REPORT                   | 13       |
| XXIV. NON-RETALIATION                             | 14       |
| XXV. ACCOUNTABILITY AND ENFORCEMENT               | 14       |
| CERTIFICATE OF COMPLIANCE                         | 15       |

*Why have a Code of Conduct?*

To promote conduct that is honest, compassionate, ethical, and compliant.

## I. INTRODUCTION

CarDon is committed to promoting honest, compassionate, ethical, and legal behavior throughout our family of communities, corporate offices, and other entities. We encourage prevention, detection and resolution of conduct that does not conform to our standards or to Federal, State, and Local laws and requirements. Therefore, CarDon has developed a Compliance and Ethics Program based on guidelines provided by the Department of Health and Human Services' Office of Inspector General, various State and Federal laws, and the Centers for Medicare and Medicaid Services.

One of our primary goals is to prevent and detect fraud, waste, and abuse. The False Claims Act is a federal law that gives the Federal and State governments a broad range of tools to combat fraud, waste, and abuse and to recover losses in federal healthcare programs. To ensure our compliance with the False Claims Act as well as other laws and regulations including CMS' Requirements of Participation, our decision-making must be resident-centered and based on the health and psychosocial needs of our residents and not based on financial benefits to CarDon, our staff or that of any other individual or entity.

This Code of Conduct, along with the Compliance and Ethics Program, advance the prevention and detection of fraud, waste, and abuse while at the same time provide for the highest level of compassionate, quality care to our residents.

In many instances, following the Code of Conduct is all that is needed. However sometimes the rules and requirements are so complex, additional guidance is necessary. We have policies and procedures that were developed to provide this additional guidance.

Our owners, Board of Directors, Executive Officers, Directors, Administrators, Managers, Supervisors, Associates, Volunteers, Vendors, Students, and other individuals associated with CarDon collectively referred to as "Team Members" must review and attest to adherence to the Code of Conduct annually to ensure that all actions are consistent with our values and principles. This Code of Conduct is a tool to guide our activities throughout each day.

Team Members should strive to protect and promote resident rights, quality of care, integrity, and ethical business practices.

*If you have questions, comments, or suggestions regarding this Code of Conduct or your responsibilities under this Code of Conduct, talk to your supervisor, call CarDon Human Resources at 317-600-2049 or call the Director of Compliance at (317) 600-2064.*

## II. WHO WE ARE

We are an Indiana family-owned company that began when Carroll and Donna Moore opened the first CarDon Community in Greenwood, Indiana in 1977 with a mission to create better communities for seniors. Their kids are continuing their parents' legacy: five became licensed nursing home administrators and four are hands-on owners and operators serving on the Board of Directors of CarDon & Associates.

With communities owned, operated, or managed in central and southern Indiana and over 40 years of caring for seniors, CarDon provides residents with the best in senior living options and personalized care. We are proud to honor Carroll and Donna Moore's legacy and commitment to serving seniors.

**OUR MISSION:** *To be the leading provider of inspired living and compassionate care to those we serve. We consider the individuals we serve to include residents, families, associates, visitors, and all others who connect with CarDon and our communities.*

**OUR VISION:** *To provide our residents—our family—with the greatest standard of senior living options and personalized care in our engaging, welcoming, and conveniently located communities. We strive to be family-centered in all that we do and foster the well-being of residents in physically, spiritually, and emotionally healthy environments.*

**OUR VALUES:**

- *We believe our residents, families, and Team Members are our family and come first.*
- *We will provide the highest quality of resident-centered care.*
- *We treat our residents, families, and Team Members with dignity, respect, confidentiality, and integrity.*
- *We will maintain an environment that is safe, consistent, compassionate, and unbiased.*
- *We seek to support the physical, emotional, and spiritual needs of those we serve.*
- *We value the talents, skills, and contributions of our Team Members.*

### **III. QUALITY OF CARE AND SERVICES**

Our goal is to provide comprehensive, quality healthcare that meets the needs of our residents in a caring and empathetic manner. We recognize the importance of preventative healthcare and focus on promoting the psychosocial well-being as well as the physical well-being of our residents. Our residents will be:

- Treated with respect and professionalism and in a manner that preserves their dignity, privacy, and self-determination.
- Involved whenever possible in decisions about their healthcare and activities of daily living.
- Provided care and services in a timely and reasonable manner.

All Team Members are responsible for providing healthcare and services while complying with all applicable laws, rules, regulations, and standards, including State and Federal requirements regarding residents' rights. Only qualified and competent individuals will provide care and services to our residents. CarDon will seek out Team Members who are professionals with proper experience and expertise to meet the needs of our residents or who have the passion and capability to learn how to meet the needs of our residents.

It is essential that Team Members bring knowledge of any deficiencies, errors, or drops in service to the attention of their supervisor or someone in authority within CarDon to ensure these problems are properly assessed and corrected. It is all Team Members' responsibility to provide only the best care for our residents.

### **IV. RESIDENTS AND RESIDENT RIGHTS**

What do we do? We take care of people. Each resident in our care has the right to a dignified existence, quality care, and self-determination. We treat each resident with respect and care for them in a manner

and in an environment that promotes maintenance or enhancement of their quality of life. We must ensure residents can exercise their rights without interference, coercion, discrimination, or reprisal from any Team Member.



**Team Members are expected to:**

- ✓ Demonstrate a resident-first ethic.
- ✓ Treat residents with respect, kindness, gentleness, empathy, and dignity.
- ✓ Respect the privacy and modesty of residents.
- ✓ Refrain from using offensive language, verbally or in writing, when referring to residents, their behavior, illnesses, or their families.
- ✓ Never harass or abuse a resident physically, verbally, mentally, or sexually.
- ✓ Treat residents equally without regard to gender, religion, race, disability, age, limited English proficiency, or sexual orientation.
- ✓ Refrain from behavior that includes intimidation, foul language, threats of violence or deprivation, or retaliation.
- ✓ Refer to residents by name and not diagnosis or location.
- ✓ Avoid the use of resident’s first names or nicknames like “honey” or “sweetie” without permission when addressing them.
- ✓ Knock on doors, introduce themselves, and wait for permission before entering a resident’s room.
- ✓ Understand that residents, and their families, are in an environment that can be unfamiliar and frightening.
- ✓ Communicate with residents using layman’s terms; in words they understand; and without acronyms.
- ✓ Keep resident medical information confidential, share it only with those who are authorized to have it and need to have it.
- ✓ Encourage residents to be involved in their own care and care decisions.
- ✓ Refrain from discussing the Team Member’s personal problems or financial difficulties with or in the presence of residents or resident family members.
- ✓ Honor resident choice and preferences.

**V. ELDER JUSTICE ACT**

The Elder justice Act was passed as part of the Patient Protection and Affordable Care Act of 2010 to combat elder abuse. Under the Elder Justice Act, Team Members are required to report the reasonable suspicion of a crime against any resident residing in our Communities.



**The reporting obligation is an individual responsibility and applies to any owner, operator, employee, manager, agent, or contractor with CarDon.** Not reporting can subject you to a civil money penalty up to \$200,000 and if the failure to report increases the harm to the resident, the penalty can be increased up to \$300,000.



**Timing of Report:** If the incident resulted in serious bodily injury, the report must be made immediately but not later than 2 hours after forming the suspicion. If the incident did not result in serious bodily injury, then the report must be made within 24 hours of forming the suspicion. Individuals may form a reasonable suspicion of a crime at different times based on

the same incident. The timing of the report is based on when the reasonable suspicion was formed.



**How to Report:** You must notify the administrator of the Community where the resident resides as soon as you have formed the reasonable suspicion that the resident is the victim of a crime. Either you or the administrator on your behalf must make a report to the Indiana Department of Health and local law enforcement.



**What to Report:** Battery, sexual assault, theft, criminal neglect, forgery, and identity theft are a few of the crimes that may be committed against a resident.

## VI. CONFIDENTIALITY AND PRIVACY

**Resident/Patient Information.** Team Members shall maintain the confidentiality of residents' Protected Health Information (PHI) as required by the Privacy Policies and applicable laws and regulations including the Health Insurance Portability and Accountability Act (HIPAA). PHI includes names, addresses, ages, social security numbers, all health information, photographs, and sometimes, gender. Team Members shall not access resident information unless there is a need to access the information because of their job requirement(s).



### Team Members should:

- ✓ Ensure proper consents or authorizations are obtained before releasing resident information to anyone. When in doubt, ask before disclosing!
- ✓ Be aware of the resident information in your possession, which may include paper, computer screens, printers, photographs, white boards, signs, and faxmachines.
- ✓ Log out or lock computers when not in use or when you walk away, even for a short time!
- ✓ Never share login information or passwords with anyone!
- ✓ Place papers with resident information in locked shredding containers, not the regular trash!
- ✓ Not discuss a resident's condition, behavior, medications, or other information where others can hear or share information with individuals who are not directly involved in the resident's care.
- ✓ Refrain from taking resident PHI out of the workplace without permission and without protection.
- ✓ Double check recipients before mailing, faxing, or emailing anything containing PHI.
- ✓ Never post any pictures or video of a resident, their room or possessions, or post anything about a resident to social media unless you are specifically authorized to do so as part of your job tasks or as authorized by CarDon.

Refer to HIPAA privacy policies and procedures or the CarDon Privacy Officer for more specific information or if you have questions.



*My best friend was admitted to our community. Is it okay if I look at her chart so I can let her family know how she's doing and help them understand her medications? **No.** We understand—you're the person family and friends go to for help with healthcare questions and you have spent your life helping people. But Team Members who have been granted access to the electronic health records may only access information needed to perform their job tasks and not for personal reasons or curiosity even if it is with the best intentions. You should let your supervisor know whenever you have a personal relationship with someone who is receiving care or services from CarDon.*

**Associate Information.** Team Members must treat personnel files, payroll information, benefits, and other personal information as confidential. The Human Resource department will maintain employment files, payroll information, disciplinary matters, workers compensation, and similar information in a confidential manner. Personnel files are held in the strictest confidence with access allowed only on a need-to-know basis. For additional information or questions, refer to Human Resource policies and procedures or contact Human Resources.



*My son needs to sell discount cards to raise funds for his high school football team. My co-workers could really benefit from the discounts at our local stores and restaurants. Is it okay if I give him our community phone list so he can contact them? **No.** Team Member information should not be given to anyone because it is personal information.*

**Passwords.** All passwords and other personal security codes are to be kept confidential. Do not share passwords or let others use your computer under your login. For additional information, review the Acceptable Use Policy.



*Sally's little girl is in Riley Hospital, so she has a lot on her mind right now and can't remember her password for MatrixCare. It wastes too much time to do a password reset and she will remember it later. Can I just log in with my username and password and then let her do what she needs to do? We do the same job and have the same access. **No.** Team Members must not allow others to login under their username and password even if they are authorized to access the information. To do so in this case will create a false record of who accessed the information and of who provided care or services to a resident.*

**Proprietary Business Information.** Confidential information includes CarDon financial data, strategic plans, statistical data, marketing plans, vendor or customer lists, documents prepared in anticipation of litigation, and communications with legal counsel. This information must not be shared with unauthorized persons such as competitors, suppliers, or outside contractors without prior approval.

**Intellectual Property.** All Team Members shall respect the intellectual property and copyright laws regarding books, trade journals, magazines, computer software, and other applicable resources. Team Members shall not copy computer software unless specifically allowed in the license agreement and/or authorization has been received from the IT Department.



## VII. DISCRIMINATION AND HARRASSMENT FREE WORKPLACE

All Team Members shall be treated with respect, dignity, and courtesy. CarDon will not tolerate intimidating or disruptive behaviors. Such behavior can contribute to hostile work environments, medical errors, poor resident satisfaction, adverse outcomes as well as increase the cost of care and cause good Team Members to seek work elsewhere.

**Acceptable behavior** is that which supports teamwork, a positive attitude, and good communication. Safety and quality of resident care is dependent on teamwork, communication, and a collaborative work environment.



### **ACCEPTABLE BEHAVIOR INCLUDES:**

- *Communicating criticism in a private and reasonable manner.*
- *Encouraging clear communication in a safe culture where everyone feels free to raise concerns and share their point of view.*
- *Expressing dissatisfaction with co-workers, supervisors, policies, schedule, through appropriate channels in civil, non-personal language and tone.*
- *Using cooperative approaches to problem-solving.*
- *Advocating for resident rights, choice, or safety.*
- *Caring for, treating, and speaking to residents with compassion, patience, empathy, and respect.*

**Unacceptable behavior** is any behavior that has a negative impact on the quality of care we deliver or the morale of our Team Members. Persistent unacceptable behavior can become harassment and create a hostile work environment.

### **UNACCEPTABLE BEHAVIOR INCLUDES:**

- *Use of profanity, name calling, or disrespectful language.*
- *Failure to respond to resident call lights or care needs.*
- *Failure to assist co-workers without good cause.*
- *Deliberate refusal to return calls or other messages concerning resident care or safety.*
- *Degrading, demeaning, or racist comments regarding residents and their families, Team Members, contractors, a Community, or CarDon.*
- *Taking unauthorized photographs or video of a resident, resident room, or resident property.*

**Disruptive behavior** is any abusive conduct including sexual or other forms of harassment or other forms of verbal or non-verbal conduct that harms or intimidates others to the extent that quality of resident care or resident safety may be compromised. Disruptive behavior may be overt or passive. Overt disruptive behavior is intimidating behavior such as sexual harassment, verbal outbursts, racial slurs, and physical threats. Passive disruptive behavior is refusing to perform assigned tasks or exhibiting an uncooperative attitude such as reluctance or refusal to answer questions, return phone calls, condescending language, voice intonation, or mocking impersonation. All disruptive behavior is unprofessional, violates this Code of Conduct, and should be reported immediately to your supervisor, Human Resources, or the CarDon HeartLine at 1-833-627-1029.

**DISRUPTIVE BEHAVIOR INCLUDES:**

- *Threats of violence, harm, or retribution toward any resident, visitor, or Team Member.*
- *Physical contact with a resident, visitor, or Team Member in a rude, intimidating, or angry manner, with or without the intent to cause harm.*
- *Throwing objects at others.*
- *Sexual harassment.*
- *Other forms of harassment or persistent inappropriate behavior.*
- *Bringing a weapon of any kind into a CarDon owned or leased property.*

Team Members must strive to work collaboratively with co-workers and communicate respectfully to and about others in a positive manner. We do not discriminate against anyone based on race, color, religion, gender, ethnicity, sex, sexual orientation, age, marital status, Limited English proficiency, veteran status, or disability. We are committed to following the laws that promote fair employment and equal treatment in hiring, placement, promotion, training, compensation, leave of absence, disciplinary action, and termination.

**VIII. ACCURATE AND HONEST BILLING**

It is critical to CarDon's success that we bill federal, state, and private healthcare plans and individuals accurately, honestly, and in compliance with each plan's requirements. Medicare and Medicaid laws prohibit billing for services that were not rendered, services that are not documented, services that are medically unnecessary; falsifying cost reports; assigning improper codes to secure reimbursement or higher reimbursement; participating in kickbacks; or retaining any overpayment for services or items. A violation of these laws may result in civil, criminal and/or administrative penalties including monetary penalties, imprisonment, loss of licensure or certification, and exclusion from participation in the Medicare and Medicaid programs.

All Team Members in our business offices and coding, billing, and collections departments must be committed to integrity in their work. All must take steps to prevent the submission of claims that are fraudulent, abusive, inaccurate, or medically unnecessary.

**\$ Examples of improper billing include:**

- *Billing for care, services or items not provided to the resident.*
- *Upcoding for higher reimbursement than is not supported by documentation.*
- *Submitting duplicate bills.*
- *Billing for services that are not medically necessary.*
- *Unbundling claims that are to be billed in bundles.*
- *Inclusion of costs that are not allowed to be reimbursed on a cost report.*
- *Billing for services provided by nonqualified staff.*

If a billing error is discovered, immediate steps will be taken to correct the error and alert the payor. We must promptly repay money we improperly receive from payors within 60 days of discovery of the improper claim information.



*While doing Triple check, I noticed that there was no documentation in the record for services to the resident. Should I still code and bill for this service under the assumption that it was done? No. Coding and billing must reflect the actual services rendered to a resident based on supporting documentation, including resident condition and diagnoses. A Team Member should never assume that a service was provided. If proper documentation is not present in the health record as required for billing purposes, then the bill should not be submitted to the payor for payment.*

## **IX. DOCUMENTATION**

Team Members must ensure that all statements, representations, and other communication to residents, prospective residents, the government, regulatory agencies, private healthcare plans, suppliers, and other entities are truthful, accurate, and complete. All resident records, financial and accounting reports, expense reports, time sheets, and other documents must accurately and clearly reflect the relevant facts and data. No one may alter or enter false information on any record or document. Team Members who suspect inaccurate documentation and/or record keeping must notify their supervisor and/or the Director of Compliance immediately.

## **X. RECORD RETENTION AND DESTRUCTION**

All Team Members must protect the integrity of documents and records to ensure that records are maintained in accordance with regulatory and legal requirements and for the required length of time. All records, including written and computer-based information such as email and computer files shall be retained and/or destroyed in accordance with our record retention policies.

## **XI. PROTECTION OF ASSETS AND RESOURCES**

All information concerning finances, operations, policies, forms, residents, development and strategic plans, computer programs, and related information should be treated as proprietary and confidential. All Team Members have access to assets and resources needed to perform their job tasks. Team Members must always protect our assets from loss, damage, carelessness, misuse, theft, and waste, including wasted supplies, equipment, space, and capital. Team members should be as careful with CarDon resources as they would be with their own. Do not use proprietary information, physical assets, such as supplies or equipment, for personal purposes or remove them from the premises without authorization. Physical assets include vehicles, office, medical, cleaning, and food supplies, tools, furnishings, televisions, computers and computer software, printers, and all other types of equipment.

Team Members whose responsibilities include management of funds and accounts shall maintain internal controls and record keeping, and exercise appropriate oversight. Any use of CarDon resources for personal financial gain is not permitted.

## **XII. KICKBACKS AND REFERRALS**

**The Anti-Kickback Statute** prohibits the health care industry from engaging in some practices that are common in other industries, such as offering or receiving gifts to reward past or future referrals of business. The Anti-Kickback Statute was created to stop financial incentives to Medicare or Medicaid

beneficiaries to purchase health services from Federally reimbursed providers and is a criminal prohibition against compensation or payment, in any form and whether direct or indirect, made purposefully to induce or reward the referral to or generation of Federal Health Care Program business. The Anti-Kickback Statute prohibits any CarDon Team Member from offering or paying anything of value in return for resident referrals. In addition, liability may arise under the False Claims Act if the Anti-Kickback Statute is violated and results in the submission of a claim for payment related to that violation.



**A REFERRAL SOURCE IS:**

*A person or entity (including employees of an entity) that refers residents or clients to CarDon or that may arrange, recommend, or order a referral to CarDon. Examples include, but are not limited to, hospitals, physicians, discharge planners, case managers, and social workers.*

**PROHIBITED CONDUCT:**

- *Waiving coinsurance or deductibles.*
- *Soliciting, accepting, or giving any gift or gratuity to a referral source if the purpose is to encourage future referrals or reward past referrals.*

### **XIII. GIFTS**

**Business Relationships.** Gifts, gratuities, or business courtesies exchanged between a Team Member and an individual or company that sells goods or services to CarDon or seeks to do business with CarDon must meet the CarDon Gifts and Business Courtesies Policy. A gift may not be accepted if it raises an actual or perceived conflict of interest or is intended to influence a business decision. No Team Member, directly or indirectly, may receive or solicit any payment, gift, gratuity, loan, meal, entertainment, stipends, travel expenses paid on their behalf, or a favor if it is for the purpose of influencing or rewarding a decision or action related to business with CarDon.

**Residents or resident families/representatives.** Team Members may not personally solicit or accept a gift of cash, cash equivalent (gift cards), or loan from a current or former resident, a resident's family, or resident's representative. Our residents are entitled to excellent care and services without providing gifts or gratuities. There are occasions, particularly around holidays, when residents and families may wish to give gifts such as flowers, candy, or cookies. This should be discouraged, but if presented with such items, the items shall be shared with co-workers. Cash or cash equivalent must never be accepted.

### **XIV. CHARITABLE AND POLITICAL ACTIVITIES**

Team Members are encouraged to participate in charitable activities and exercise their rights as citizens. Team Member participation in charity events or the political process must be voluntary, during their own time, and in a manner that does not harm or embarrass CarDon.



### **GUIDELINES FOR CHARITABLE AND POLITICAL ACTIVITIES**

- Prior authorization from a member of the Senior Executive Team (SET) must be received before CarDon funds or use of CarDon property or services can be donated to any charitable organization or any political candidate, party, or committee.
- Participation in a charity or political fundraising event or similar activities should not be a distraction or take away from work duties.
- Individual Team Members should refrain from using CarDon group email distribution lists to solicit for charitable or political contributions, unless otherwise approved by the SET.

## **XV. CONFLICT OF INTEREST**

We have a duty to place the interest of CarDon ahead of our personal interests by avoiding both financial and clinical conflicts of interest. A conflict of interest may occur if a Team Member's outside activities or personal financial interests influence or appear to influence their ability to make objective decisions while carrying out the responsibilities and obligations of their employment with CarDon.

CarDon requires certain personnel to disclose financial interests that they (or their immediate family) may have that would interfere or affect their actions and decisions for or on behalf of CarDon. Completion of a Conflict-of-Interest Disclosure form is a mandatory tool used to identify actual and potential conflicts. Team Members should never use their position at CarDon to profit personally or assist others in profiting at the expense of CarDon. Anyone who fails to disclose actual or potential conflicts of interest will be subject to disciplinary action up to and including termination.

## **XVI. CONTRACTORS AND VENDORS**

All CarDon contractors and vendors are required to follow applicable laws, regulations, and CarDon policies, including this Code of Conduct.

## **XVII. EXCLUSION SCREENING AND MONITORING**

Federal law prohibits CarDon from employing or doing business with individuals or entities that have been excluded from directly or indirectly receiving funds or contracting with the government. The U.S. Department of Health and Human Services Office of Inspector General (OIG), U.S. General Services Administration, Centers for Medicare and Medicaid, and State Medicaid agencies maintain lists of individuals and entities that have been excluded in this manner.



**Reasons the government may exclude an individual or entity include:**

- Conviction of a criminal offense related to the provision of healthcare services or items
- Healthcare fraud
- Resident/patient/client abuse
- Sanctions from state licensing boards

All Team Members are screened against exclusions lists before employment begins and vendors are screened during the approval process. Team Members and vendors are then screened at least monthly to ensure compliance with the requirements of federal law.

Cardon will not engage the services of any individual or entity that has been convicted of a healthcare related crime or has been excluded. After hire or execution of an agreement, any Team Member who is excluded or is convicted of a crime must notify CarDon as soon as the Team Member is made aware of the exclusion or the conviction.

**XVIII. LICENSURE AND CERTIFICATION**

Team Members who are required to have credentials, including license or certification, to meet the responsibilities and obligations of their job, must maintain their credentials in good standing. It is the Team Member’s responsibility to renew their credentials timely and verify that they are in good standing with the entity that issues their license or certification.

When a Team Member aware that a sanction or disciplinary action is being pursued against their license or certification, that Team Member must report the action or potential action to their supervisor and/or the Executive Director of Human Resources. If a lapse or lack of valid license occurs, the Team Member must be suspended immediately from duties and the Executive Director of Human Resources and Director of Compliance must be notified.

**XIX. WHISTLEBLOWER**

A whistleblower is anyone who reports an activity they consider to be illegal or dishonest. The whistleblower is not responsible for investigating the activity or for determining fault or corrective actions. Team Members are encouraged and enabled to raise concerns internally, allowing us to address and correct inappropriate conduct and actions. It is the responsibility of everyone to report concerns about violations of this Code of Conduct or suspected violations of law or regulations.



**Examples of activities to report include violations of federal, state, or local laws; billing for services not performed, not needed, or for goods not delivered; any fraudulent financial reporting.**

If a Team Member has knowledge of or a concern about suspected illegal, unethical, dishonest, or fraudulent activity, they report it to a supervisor, manager, or the Director of Compliance. Intentionally reporting a baseless or false allegation of wrongdoing may result in disciplinary action.

## XX. GOVERNMENT INVESTIGATIONS AND SURVEYS

CarDon and Team Members shall cooperate fully and promptly with licensure and certification surveys and other government investigations into potential violations of the laws and regulations. Survey activities should be promptly reported to the Director of Clinical Services, Operations, and Director of Compliance. Law enforcement or other governmental entity inquiries or requests should be immediately referred to the Director of Compliance or Director of Legal Affairs.

Team Members may not take any actions to prevent, hinder, or delay an investigation.



### **During, or in anticipation of, an investigation, you shall not:**

- Conceal, destroy, or alter any records or document.
- Make any false or misleading statement.
- Pressure any other person to destroy or alter any record or document; to provide false information or hide information.

## XXI. MEDIA RELATIONS AND SOCIAL MEDIA

From time to time or during an emergency event, Team Members may be contacted by media. Only authorized Team Members may respond to media requests. Media inquiries should be referred to the Chief Marketing Officer or Chief Strategy and Legal Officer.



### **What do I do if the Media calls or shows up at my work?**

- If representatives of the Media are at your work location, politely avoid or decline interaction and ensure the administrator, COO, Chief Marketing Office, or Chief Strategy and Legal Officer receive immediate notification.
- If a representative of the Media calls, Team Members should politely thank them for the call, request the caller's name, entity they represent, and a return phone number then inform the caller that their message will be promptly forwarded to the appropriate person for a response.
- Without being rude or causing a disturbance, refrain from providing your name, job title, or volunteering any information about CarDon or any situation that caused the Media inquiry.

Should a Team Member choose to use social media or list CarDon as their employer on a social media site, they must follow this Code of Conduct while posting, commenting, or sharing information. Under no circumstances can a Team Member post an image, photo, video, audio, or information about a resident or former resident on a social media site. See CarDon Social Media policy for more details. Any suspicion or knowledge that there has been anything involving a resident posted to a social media site must be immediately reported to the Director of Compliance or Director of Legal Affairs.

## XXII. EDUCATION AND TRAINING

CarDon is committed to education and training and believes they are key elements to providing the quality of care, excellent service, accurate billing, and engaging in the ethical and legal business practices that are the core of our mission, vision, and values. Training is provided to ensure Team Members are informed on policies, laws, compliance, and ethics and have received the knowledge and skills required to perform their job duties. Minimum education and training requirements have been established by laws and the CarDon Compliance and Ethics Program and must be completed by the certain deadlines. Team Members who have not completed required training in a timely manner may be relieved of their job duties until requirements are met.

## XXIII. RESPONSIBILITY TO REPORT

Compliant and ethical conduct is everyone's responsibility. Therefore, all Team Members are required to report a good faith belief of any suspected or actual violation of the Code of Conduct, policies, procedures, or applicable law or regulation. Sometimes it is unclear whether a particular situation or activity is a violation. Team Members should contact their supervisor or the Director of Compliance if they have any questions.

### THERE ARE MANY WAYS TO REPORT:

- Verbally or in writing to your supervisor, department manager, or administrator.
- Report via the CarDon HeartLine at 833-627-1029 or go to [cardon.ethicspoint.com](http://cardon.ethicspoint.com), available 24 hours a day/7 days a week (**reporting to the CarDon HeartLine may be anonymous**).
- Mail the Director of Compliance at 11313 USA Parkway, Suite E-148, Fishers, IN 46037
- Email the Director of Compliance at [cardoncompliance@cardon.us](mailto:cardoncompliance@cardon.us).
- Fax the Director of Compliance at 317-468-9251.
- Call the Director of Compliance at 317-600-2064.

### ? WHAT SHOULD YOU REPORT?

The following are examples of violations of the Code of Conduct, policies, laws, or regulations that should be reported, but it is not all inclusive.

- ✓ Any actual, suspected, or allegation involving resident abuse, neglect, or misappropriation of resident property.
- ✓ Medication errors or drug diversion.
- ✓ Harassment, discrimination, or retaliation.
- ✓ Falsified information or documentation.
- ✓ Questionable billing practice.
- ✓ Unsafe work environment.
- ✓ Privacy/HIPAA violation.
- ✓ Resident Rights violation.
- ✓ Social Media posting involving a resident's image or resident information.



#### **XXIV. NON-RETALIATION**

CarDon is committed to fostering a workplace where all Team Members can work together in a safe culture of respect and empathy where everyone feels free to raise concerns and share their point of view. To promote this culture, CarDon has a strict non-retaliation policy.



**NON-RETALIATION MEANS THERE WILL BE NO ADVERSE ACTION, RETALIATION, OR RETRIBUTION FOR A TEAM MEMBER'S GOOD FAITH ACTIONS IN:**

- Reporting a violation or suspected violation.
- Participating in an investigation pertaining to an alleged violation.
- Conducting, or assisting with, an investigation pertaining to an alleged violation.

Any manager, supervisor, or other Team Member who commits or condones any form of retaliation will be subject to discipline up to, and including, termination of employment or affiliation with CarDon.

#### **XXV. ACCOUNTABILITY AND ENFORCEMENT OF CODE OF CONDUCT**

Team Members will conduct themselves and CarDon business with honesty, integrity, and in accordance with this Code of Conduct. This Code of Conduct is a condition of employment with CarDon. Team Members will be subject to discipline for violations of the Code of Conduct or failure to detect or report a violation of the Code of Conduct up to and including termination of employment or affiliation with CarDon.