

Code of Business & Ethical Conduct

In accordance with the Mission and Values of United Methodist Communities and its tradition of integrity, honor, and concern for others, this Code of Business & Ethical Conduct signifies United Methodist Communities' sincere efforts to comply with applicable laws, rules, regulations, and its own policies and procedures. All United Methodist Communities associates, trustees, officers, managers, supervisors, contractors, medical staff, volunteers, students, and other associated parties will seek to deter, detect, and correct improper conduct. As a result, these parties will:

- Support the Mission and Values of United Methodist Communities;
- Abide by applicable laws, rules, regulations, and policies and procedures;
- Disclose any known or potential conflicts of interest;
- Notify the appropriate person(s) in a timely manner of possible noncompliance issues;
- Deal openly and honestly with fellow associates, customers, contractors, government entities, volunteers, medical staff members, and others;
- Maintain high standards of business and ethical conduct in accordance with applicable federal, state and local laws and regulations including fraud, waste, and abuse;
- Preserve the confidentiality of UMC resident and business information;
- Refuse offers, solicitations, and payments to induce referrals of the people we serve;
- Ensure compliance requirements regarding billing are monitored and enforced;
- Use supplies and services in a manner that avoids waste;
- Protect and retain records and documents as required by professional standards, governmental regulations and organizational policies;
- Exercise discretion in the billing of services, regardless of payer source;
- Use the reporting system appropriately while refraining from knowingly making untrue allegations;
- Cooperate fully with any investigation that may be conducted;
- · Attend and participate in compliance program educational and training opportunities; and
- Refrain from retaliation against others who report compliance concerns;

As part of this commitment to ethical conduct, all United Methodist Communities associates, trustees, officers, managers, supervisors, contractors, medical staff, volunteers, students, and other associated parties have an obligation to abide by, and support, the Compliance Program and its policies and procedures. This Code of Business & Ethical Conduct demands personal accountability. If a suspected act of misconduct occurs at any level within the organization, individuals, while refraining from knowingly making untrue allegations, have an obligation to report the act to the UMC Compliance Officer, an immediate supervisor, a member of Senior Leadership, Human Resources, or the local Compliance Officer. In addition, a confidential, toll-free Compliance Hotline (1-866-867-6886) is available for guidance and to report suspected instances of fraud, waste, and abuse.

Although associates are strongly encouraged to voice legitimate concerns, associates with documented histories of making untrue allegations may be subject to disciplinary action. Furthermore, reporting wrongdoing or acts of noncompliance will not protect parties from discipline and corrective action if the reporting parties are in some way responsible for the wrongdoing.

When a potential act of noncompliance is identified, a prompt, thorough, and responsible investigation will occur and a corrective action plan will be implemented. Violations of the Code of Business & Ethical Conduct and the Compliance Program's policies and procedures are considered to be serious matters and will be subject to appropriate corrective and/or disciplinary action.

Implementation of the Compliance Program and this Code of Business & Ethical Conduct represents United Methodist Communities' continued efforts to exemplify its Mission and Values and commitment to ethical conduct throughout the organization.