

Regulatory Excellence

We are obligated to follow federal, state and local laws that govern our business. We are all responsible for learning and staying current in order to perform our job responsibilities.

INCLUDING

- Committing to honest and ethical billing and communications.
- Avoiding any kickbacks for referrals.
- Avoiding inducements.
- Respecting copyright laws.
- Operating with standards of financial practices and controls.
- Dealing fairly with everyone with whom we have contact.
- Integrity and accuracy of all documentation.
- Voluntarily disclosure when we find that we are out of compliance.
- Cooperating with government investigations.

Disciplinary action will be taken against any Keswick Team Member who fails to act in accordance with the Code of Conduct, the compliance and ethics program, supporting policies and procedures and applicable federal and state laws.

Our success depends on your commitment to act with integrity, both personally and as part of our organization.

A Personal Obligation:

You have a duty to report any problems you observe or perceive, regardless of your role.

THREE STEP REPORTING PROCESS

- 1 Talk to your supervisor. He or she is most familiar with laws, regulations and policies that relate to your work.
- 2 If you are unable to talk to your supervisor, seek out another member of the management team or Human Resources.
- 3 If you still have a concern, contact the Compliance Officer or a member of the organization's Compliance Committee.

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If none of these resolve your issue, you may call the

**COMPLIANCE HOTLINE:
1-800-211-2713**

Your calls are confidential and you may call **ANONYMOUSLY** if you choose.
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Code of
CONDUCT

Kathy Graning, Compliance Officer
Eula Dean, Compliance Liaison
Keswick Multi-Care Center, Inc.
700 West 40th Street Baltimore,
Maryland 21211

 **KESWICK**
Right Care. Right Time. Right Place.

Code of Conduct

for Keswick Multi-Care Center, Inc.

Keswick Multi-Care Center, Inc. (“Keswick”) is a mission driven long term care and community services facility.

Our Compliance and Ethics program covers the compliance issues, laws, regulations and guidelines that are relevant to a provider of senior services, including residential, assisted living/personal care and skilled nursing services.

Our Code of Conduct is a shared responsibility that applies to every person at every level of our organization. This includes employees, the board of directors, volunteers, independent contractors, subcontractors and vendors who may provide, or are involved with, healthcare or billing.

As you read this summary of our Code of Conduct, the words Team Member will be used. This term includes all employees, vendors, contractors, volunteers and directors and officers providing care and services here at Keswick.

Our Code of Conduct is supported and guided by policies and procedures. Any questions regarding our Code of Conduct or our policies and procedures can be directed to your immediate supervisor, the Compliance Officer, or any member of the Compliance Committee.

For a copy of the entire Code of Conduct, please visit our website at: choosekeswick.org or contact our Compliance Liaison or Compliance Officer:

Name: Eula Dean, Compliance Liaison, 410-662-4331

Email: DeanE@ChooseKeswick.org

Name: Kathy Graning, Compliance Officer, 410-662-4208

Email: GraningK@ChooseKeswick.org

Fax: 410-235-7425

Care Excellence

Our most important job is providing quality care to our residents. This means offering compassionate support to our residents and working toward the best possible outcomes while following all applicable rules and regulations.

INCLUDING:

- Honoring Resident Rights.
- Zero tolerance for Abuse and Neglect.

Any Team Member who abuses or neglects a resident is subject to termination as well as legal and criminal action. Abuse and neglect are to be reported to your supervisor immediately.

- Maintaining confidentiality of all resident information.
- Respecting and protecting resident property to prevent loss, theft, damage and misuse.
- Providing Quality Care.
 - Accurate assessments and care planning.
 - Providing only medically needed services.
 - Using current practice standards.
 - Accurate and timely documentation.
 - Measuring clinical outcomes.
- Assuring our workforce has appropriate experience and expertise to provide services.
- Quality Assurance Performance Improvement programs to improve outcomes.
- Committing to comprehensive medically needed services. The Medical Director will have oversight of physicians and other medical services.

Professional Excellence

The professional, responsible and ethical behavior of every Team Member reflects on the reputation of our organization and the services we provide. Whether you work directly with residents or in other areas that support resident services, you are expected to maintain our standards of honesty, integrity and professional excellence every day.

INCLUDING:

- Hiring the best qualified employees regardless of race, color, age, religion, national origin, gender identity, sexual orientation or disability.
- Employee screening.
- Making the workplace a safe, ethical and comfortable environment including a workplace free of substance abuse.
- Assuring company privacy and assuring proprietary information is kept confidential.
- Following the Business Courtesies and Resident Gifts policies.
- Reporting any actual or potential conflict of interests.
- Using property appropriately and respecting property and copyright laws.
- Ensuring appropriate use of computers which eliminates improper, unlawful activity, downloads or use of games on our community’s computers.
- Being responsible as an organization to have honest and ethical vendor relations.
- Assuring truth in our marketing and advertising.



Compliance and Ethics Program

Code of Conduct

Keswick Multi-Care Center
700 West 40th Street
Baltimore, Maryland 21211
410.235.8860
<http://choosekeswick.org>

Revised: November, 2017

TOLL-FREE COMPLIANCE HOTLINE

1.800.211.2713

The COMPLIANCE HOTLINE is a confidential telephone line for all Employees and Associates to use to report suspected misconduct or to get advice on proper business conduct. The Compliance Hotline is available 24 hours a day, and will be answered by an independent monitoring agency. Any Employee, who reports a concern in good faith, cannot be subject to retaliation of any kind.

Corporate Compliance Officer

Kathryn Graning
Keswick Multi-Care Center
700 W. 40th Street
Baltimore, MD 21211
Phone - 410.662.4208

Our Compliance and Ethics Program Code of Conduct (the “Code”) covers the compliance issues, laws and regulations, and guidelines that are relevant to Keswick. This includes but is not limited to Medicare and Medicaid regulatory issues; guidelines from the Office of Inspector General, Internal Revenue Service, and the Office of Civil Rights of the Department of Health and Human Services, Occupational Safety and Health Administration; as well as other federal and state regulatory and business issues. The program fosters a culture of compliance that promotes legal and ethical behavior in the workplace by creating processes that detect and prevent fraud, waste, abuse, and policy violations. **The Code is supported by our compliance policies and procedures and should be read and understood jointly with those policies and procedures.**

TO WHOM DOES THE CODE OF CONDUCT APPLY?

This Code applies to Keswick’s Employees and Associates identified below:

Employees:

- Executive Officers
- Directors, Managers and Supervisors
- Employees

Associates:

- Board of Trustees and Directors
- Medical staff
- Volunteers
- Contractors
- Vendors

Compliance Program Management

Our Board of Directors, through the CEO / President, carries the overall responsibility for creating a culture that values and emphasizes compliance and integrity.

The Corporate Compliance Officer has been appointed by the CEO & President and approved by the Board of Directors as the Compliance Officer and is responsible for coordinating the day-to-day compliance activities in conjunction with the Privacy Officer (Director of Information Technology). These activities include audits, responses to hotline calls, and leading the organization's Compliance Committee.

Keswick's Compliance Committee is comprised of members of the management team and other key staff positions. The Corporate Compliance Officer is the chairperson for this committee. The committee meets at least quarterly, and more frequently as needed.

Employees and Associates, listed above, should read and abide by the guidelines listed in this document. If at any time a question arises as to what is expected from you, check with your supervisor or consult with the Corporate Compliance Officer, whose name and phone number is listed in this document.

INTRODUCTION

Purpose

Keswick is a not-for-profit, tax-exempt, mission driven organization. At Keswick, our mission is to provide compassionate, quality care to all residents and individuals served.

The Code describes general guidelines for Employees and Associates of Keswick on some important laws and policies affecting our professional activities. The Code also addresses business ethical issues and should assist Keswick Employees and Associates in understanding what is expected of them at work. The Code does not directly address medical ethical issues, which are covered in other policies of Keswick.

The Code cannot answer every question or concern an Employee or Associate might have relating to legal and ethical behavior in the workplace. However, it can and should serve as a starting point. If you have any questions or concerns that are not addressed in this document, contact your supervisor. If your supervisor is not able to provide assistance or if it is not possible or comfortable to talk to your supervisor, contact the Corporate Compliance Officer or the Compliance Hotline. The names and phone numbers for these resources are listed on the beginning of this document.

Keswick will protect the confidentiality of Employees and Associates who contact them with

questions and concerns as much as possible – although there may be certain situations which may require an Employee’s or Associate’s name to be revealed. (If revealing the identity of the Employee or Associate is necessary, reasonable efforts will be made to notify such Employee or Associate, in advance, if possible.) Under no circumstances will Keswick allow retaliation to occur against an Employee or Associate for the act of raising a concern, asking a question or reporting suspected misconduct. Even if a suspected problem turns out to be unfounded, as long as it was reported in good faith, no Employee or Associate will ever suffer any harm from Keswick as a result.

This document is meant to be used as a guide when potential ethical and legal issues arise in your day-to-day activities.

The Code clearly requires that no Employee or Associate should ever be expected, encouraged or allowed to violate any law. All Employees and Associates are expected to conduct their work activities with honesty, integrity and the highest ethical values.

OUR VALUES

Mission

Keswick Multi-care’s mission is to enhance the quality of life of chronically ill older adults by providing compassionate, quality care to the residents and individuals served, along with sensitivity and understanding to family members. Our goal is to provide a complete continuum of long-term care that encompasses the community/home, adult day care, and nursing care. Keswick is committed to providing quality care through innovative and futuristic approaches to older adults of all races and creeds.

Vision

Keswick's vision is to develop, deliver and manage premier senior service programs in our Baltimore Market Area that can be emulated nationally by others - always focused on the delivery of compassionate care combined with clinical and community-based research. Our emphasis is on the preservation of individual independence, dignity and respect as we seek to meet individual care needs in a place our clients call home.

Core Values

Commitment to Quality Care

As a caring organization, Keswick will strive to surpass expectations in all aspects of long-term care.

Integrity and Accountability

Open and honest communication will be maintained, along with responsibility for actions, at all times.

Compassion, Sensitivity and Respect

At all times, understanding and respect will be extended to all including our staff and volunteers.

Improving Our Community

With innovative and futuristic approaches to long-term care accessible to individuals of all races and creeds, our community will be made a better place.

COMMITMENT TO QUALITY CARE

Quality of Care

Keswick is committed to providing care and services to its residents to attain and maintain the resident's highest practicable physical, mental, spiritual and psychosocial well-being.

Our primary commitment is to provide the care, services, and resources necessary to help each resident reach or maintain his or her highest possible level of physical, mental, and psychosocial well-being. Keswick has policies and procedures and provides training and education to help each Employee strive to achieve this goal.

Our care standards include:

- Accurately assessing the individual needs of each resident and developing interdisciplinary care plans that meet those assessed needs;
- Reviewing goals and plans of care to ensure the resident's ongoing needs are being met;
- Providing only medically necessary, physician prescribed services and products that meet the resident's clinical needs;
- Confirming that services and products (including medications) are within accepted standards of practice for the resident's clinical condition;
- Ensuring that services and products are reasonable in terms of frequency, amount, and duration;
- Measuring clinical outcomes and resident satisfaction to confirm that quality of care goals are met;
- Providing accurate and timely clinical and financial documentation and record keeping;
- Ensuring that resident's care is given only by properly licensed and credentialed providers with appropriate background, experience, and expertise;
- Reviewing resident care policies and procedures and clinical protocols to ensure that they meet current standards of practice; and
- Monitoring and improving clinical outcomes through a Quality Assurance Performance Improvement (QAPI) Committee with established benchmarks.

Medical Services

We are committed to providing comprehensive, medically necessary services for our residents. The Medical Director provides oversight to physicians and other medical providers and services as defined by state and federal regulations. The Medical Director oversees the care and treatment policies and is actively involved in the Quality Assurance Performance Improvement (QAPI) Committee.

Resident Rights

Keswick's mission is to provide compassionate quality care to those we serve. Fundamental to that mission is recognition that all people, at whatever level of needs, are entitled to a dignified existence that promotes freedom of choice, self-determination and reasonable accommodation of individual needs. Residents have a fundamental right to care that safeguards their personal dignity and respects their cultural, psychosocial, and spiritual values.

Advance Directives

Keswick respects and encourages the use of advance directives by our residents.

ABUSE AND NEGLECT

We will not tolerate any type of resident abuse or neglect – physical, emotional, verbal, financial, or sexual. Residents must be protected from abuse and neglect by Employees and Associates, family members, legal guardians, friends, or any other person. This standard applies to all residents at all times.

Federal law defines abuse as the willful infliction of injury, unreasonable confinement, intimidation, or punishment with resulting physical harm, pain, or mental anguish. This presumes that instances of abuse of all residents, even those in a coma, cause physical harm, or pain or mental anguish. Neglect means failure to provide goods and services necessary to avoid physical harm, mental anguish, or mental illness. The failure to follow a resident's care plan may constitute abuse.

The State of Maryland defines abuse as: *"the sustaining of any physical injury by a vulnerable adult as a result of cruel or inhumane treatment or as a result of a malicious act by any person."*

Any Employee or Associate who abuses or neglects a resident is subject to termination. In addition, legal or criminal action may be taken. Abuse and neglect MUST BE REPORTED IMMEDIATELY to your supervisor or other member of management.

ELDER JUSTICE ACT

The Elder Justice Act requires timely reports of any reasonable suspicion of a crime against a resident of a long term care facility. You must report your reasonable suspicion to the Office of Health Care Quality and local law enforcement within two (2) hours if the suspected crime involves serious bodily injury or within 24 hours if the suspected crime does not involve serious bodily injury.

***DO NOT call the Compliance Hotline for allegations of abuse or neglect.
Report abuse or neglect immediately to your supervisor!***

RESIDENT CONFIDENTIALITY/HIPAA

All Employees and Associates must use and disclose medical, financial, or personal information only in a manner consistent with the HIPAA Privacy policies and procedures and state and federal law. You are responsible for keeping resident protected health information (PHI) confidential. PHI is defined as individually identifiable health information that is transmitted or maintained in any form or medium, including electronic health information.

Any unauthorized exposure of PHI which compromises the security or privacy of information is a potential breach.

If you become aware of a breach of any protected or sensitive information it is important that you report it immediately to your supervisor or the Privacy Officer.

If the disclosure results in a breach, Keswick Multi-Care Center, Inc. must investigate and comply with all state and federal HIPAA regulations for breach notification.

INTEGRITY AND ACCOUNTABILITY

Report Information Accurately and Completely

Keswick functions in a highly regulated industry, dealing with numerous governmental agencies, while also complying with various Federal and State laws. Some of these agencies include: the Office of Civil Rights of the Department of Health and Human Services (Federal), Occupational Safety and Health Administration (Federal), Internal Revenue Service, Maryland Department of Health and Mental Hygiene, Maryland Department of Aging. Three of the important laws include:

Health Care Fraud Law – It is a Federal crime to knowingly and willfully execute or attempt to execute a scheme to defraud any health care benefit program, or to obtain money or property from a health care benefit program through false representations. This law applies not only to Federal health care programs, but to most other types of health care benefit programs as well.

False Statements Relating to Health Care Matters Law – It is a Federal crime to knowingly and willfully falsify or conceal a material fact, or make any materially false statement or use any materially false writing or document in connection with the delivery of or payment for health care

benefits, items, or services.

False Claims Act – This law prohibits knowingly presenting to the Federal Government a false or fraudulent claim for payment or approval. Additionally, it prohibits knowingly making or using (or causing to be made or used), a false record or statement to get a false or fraudulent claim paid or approved by the Federal Government or its agents, like a carrier, other claims processor, or State Medicaid program.

No False, Fictitious or Fraudulent Claims

On a regular basis, we are required to record, compile, maintain and submit information to these governmental agencies, while adhering to the scope and intent of the various laws. All Employees and Associates who prepare or submit information to government agencies are expected to do so diligently and with the highest degree of integrity. Dishonesty may result in monetary fines or imprisonment. Employees shall be subject to disciplinary action, including termination if found to violate any law regarding proper coding and billing of health care items and services while employed at Keswick.

If Keswick is ever asked to provide documents or other information to a government agency, it is our policy to cooperate fully as required by law. We believe that cooperating with government agencies is in everyone's best interests.

Any question with regard to the accuracy of a medical claim should be directed to your supervisor, the Corporate Compliance Officer, or the Compliance Hotline.

Keswick Employees and Associates should carefully submit the appropriate documentation required by the relevant governmental agency, insurance company or other third party, along with the appropriate supporting medical documentation. All Keswick billing Employees will be trained and updated regarding changes relative to billing requirements.

If you have concerns about possible fraudulent and/or inaccurate billing records, please contact your supervisor, the Corporate Compliance Officer or the Compliance Hotline.

PROFESSIONAL EXCELLENCE

The professional, responsible, and ethical behavior of every TEAM MEMBER reflects on the reputation of our organization and the services we provide. Whether you work directly with residents or in other areas that support resident services, you are expected to maintain our standards of honesty, integrity, and professional excellence, every day.

Hiring and Employment Practices

Keswick is committed to fair employment practices. When hiring and evaluating, we:

- Comply with federal, state, and local Equal Employment Opportunity laws, hiring the best qualified individuals regardless of race, color, age, religion, national origin, gender identity, sexual orientation, genetic information (use state specific information in highlighted area), or disability. All promotions, transfer evaluations, compensation, and disciplinary actions also follow this policy.
- Conduct employment screenings to protect the integrity of our workforce and welfare of our residents, Employees, and Associates.
- Require all who need licenses or certifications to maintain their credentials in compliance with state and federal laws. Documentation of licenses or certifications must be provided.

Employee Screening

Employees are screened in accordance with federal and state law to ensure the safety of our residents. Screening procedures have been implemented and are conducted prior to hire and at a minimum of quarterly thereafter.

Keswick is prohibited by federal law from employing, retaining, or contracting with anyone who is excluded from any federal or state funded programs. Screening of all Employees and Associates through the Office of Inspector General's List of Excluded Individuals and Entities, GSA's System of Award Management, and Maryland's Medicaid Excluded Provider List database is conducted prior to hire and at a minimum of quarterly thereafter.

As long as you are employed or affiliated with Keswick, you must immediately report to your supervisor:

- If you are arrested or indicted for a criminal offense;
- If you are convicted of an offense that would preclude employment in a healthcare facility;
- If action has been taken against your license or certification; or
- If you are excluded from participation in a federal or state healthcare program.

Licensure and/or Certification Verification

We are committed to ensuring that only qualified professionals provide care and services to residents. Practitioners and other professionals treating residents must abide by all applicable licensing, credentialing and certification requirements. In addition, every effort is made to validate licenses and certification through the appropriate state or federal agency.

Employee Relations

To maintain an ethical, comfortable work environment, staff must:

- Refrain from any form of sexual harassment or violence in the workplace;
- Treat all colleagues and co-workers with equal respect, regardless of their national origin, race, color, religion, sexual orientation, age, gender identity, (specific to organization policy) or disability;
- Protect the privacy of other Employees and Associates by keeping personal information confidential and allowing only authorized individuals access to the information;
- Not supervise or be supervised by an individual with whom they have a close personal relationship; and
- Behave professionally and use respectful communication at all times.

Workplace Safety

Maintaining a safe workplace is critical to the well-being of our residents, visitors, and co-workers. That is why policies and procedures have been developed describing the organization's safety requirements. Every Employee and Associate should become familiar with safety regulations and emergency plans regarding fire and disaster in his or her work area.

In addition to organizational policies, we must abide by all environmental laws and regulations. You are expected to follow organizational safety guidelines and to take personal responsibility for helping to maintain a secure work environment. If you notice a safety hazard, you must take action to correct it if you can or to report it to your supervisor immediately.

Prevent Workplace Violence

Resolving conflicts is not always easy or pleasant. We all must make every effort to resolve conflicts in a reasonable and rational manner. At no time should Employees or Associates use physical or psychological force, or threats of force, to resolve disputes.

Drug and Alcohol Abuse

We are committed to maintaining a team dedicated and capable of providing quality resident services. To that end, you are prohibited from consuming any substance that impairs your ability to provide quality services or otherwise perform your duties.

You may never use, sell, or bring on our property alcohol, illegal drugs, and/or narcotics or report to work under the influence of alcohol, illegal drugs, and/or narcotics. For an Employee or Associate who appears to have work performance problems related to drug or alcohol use, a drug and alcohol screening will be conducted and appropriate action will be taken, if necessary.

Illegal, improper, or unauthorized use of any controlled substance that is intended for a resident

is prohibited. If you become aware of any improper diversion of drugs or medical supplies, you must immediately report the incident to your department supervisor, the Compliance Officer, or use the Compliance Hotline. Failure to report a known instance of noncompliance with this policy may result in disciplinary action against the Employee or Associate, up to and including termination.

Organizational Relations

Professional excellence in organizational relations includes:

- Complying with federal tax law to maintain tax exempt status under section 501(c)(3) of the Internal Revenue Code;
- Maintaining company privacy and keeping proprietary information confidential;
- Avoiding outside activities or interests that conflict with responsibilities to Keswick and reporting such activity or interest prior to and during employment;
- All requests from reporters or other media for information should be referred to the Director of Public Relations or the Chief Executive Officer. Employees and Associates should never release any Keswick information to the press or other mass communications media through other channels without the permission of the Director of Public Relations or the Chief Executive Officer; and
- Requiring that Keswick complies with the licensing and certification laws that apply to its business.

Proprietary Information

In the performance of your duties you, may have access to, receive, or may be entrusted with confidential and/or proprietary information that is owned by Keswick Multi-Care Center, Inc. and that is not presently available to the public. This type of information should never be shared with anyone outside the organization without authorization from a member of the leadership team.

Examples of proprietary information that should not be shared include:

- Resident, Employee, or Associate data and information;
- Details about clinical programs, procedures, and protocols;
- Policies, procedures, and forms;
- Training materials;
- Current or future charges or fees or other competitive terms and conditions;
- Current or possible negotiations or bids with payers or other clients;
- Compensation and benefits information for staff;
- Stocks or any kind of financial information; and
- Market information, marketing plans, or strategic plans.

Gifts

You may not accept any tip or gratuity from residents and you may not receive individual gifts

from residents. You may not give gifts to residents.

You may not borrow money from nor lend money to residents; nor may you engage with residents in the purchase or sale of any item. No Employee or Associate may accept any gift from a resident under a will or trust instrument except in those cases where they are related by blood or marriage.

Employees or Associates may not serve as a resident's executor, trustee, administrator, or guardian or provide financial services or act under a power of attorney for a resident except in those cases where they are related by blood or marriage unless otherwise allowed by state law.

Business Courtesies

Keswick prohibits any Employee or Associate from offering, giving, soliciting, or accepting business or professional courtesies including entertainment and gifts that could be interpreted as attempts to influence decision making. Under no circumstances will an Employee or Associate solicit or accept business courtesies, entertainment or gifts that depart from the Business Courtesies policy.

Conflict of Interest

A conflict of interest exists any time your loyalty to the organization is, or even appears to be, compromised by a personal interest. . All Keswick management employees, as well as all Board trustees and directors are required to execute an annual conflict of interest statement.

There are many types of conflict of interest and these guidelines cannot anticipate them all, however the following provide some examples:

- Financial involvement with vendors or others that would cause you to put their financial interests ahead of ours;
- Employee or Associate participation in public affairs, corporate or community directorships, or public office;
- An immediate family member who works for a vendor or contractor doing business with the organization and who is in a position to influence your decisions affecting the work of the organization;
- Participating in transactions that put your personal interests ahead of Keswick or cause loss or embarrassment to the organization;
- Taking a job outside of Keswick that overlaps with your normal working hours or interferes with your job performance; or
- Working for Keswick and another vendor that provides goods or services at the same time.

All Employees and Associates must seek guidance and approval from our CEO or Compliance Officer before pursuing any business or personal activity that may constitute a conflict of interest.

Use of Property

We must protect the assets of the organization and ensure their authorized and efficient use. Theft, carelessness, and waste have a direct impact on the organization's viability. All assets must be used solely for legitimate business purposes.

Everyone must make sure that they:

- Only use property for the organization's business, not personal use;
- Exercise good judgment and care when using supplies, equipment, vehicles, and other property; and
- Respect copyright and intellectual property laws; or
- If unable to assess the copyright or intellectual property laws, never copy material and/ or download software.

Computers / Internet

Employees and Associates are expected to use computers, email, and internet/intranet systems appropriately and according to the established policy and procedure. You are not permitted to use the Internet for improper or unlawful activity or download any games or music without prior approval.

Internet use can be tracked and how you use your time on the Internet may be monitored. You should have no expectation of privacy when you use our computers, email, and internet/intranet system. Our organization has the right to sanction or discipline employees who violate the Code of Conduct in a digital, cyber, or other non-face-to-face environment. You should be familiar with our Social Media policy and abide by it.

Vendor Relationships

We take responsibility for being a good client and dealing with vendors honestly and ethically. We are committed to fair competition among prospective vendors and contractors for our business. Arrangements between Keswick and its vendors must always be approved by management. Certain business arrangements must be detailed in writing, and approved by management. Agreements with contractors and vendors who receive resident information, with the exception of care providers, will require a Business Associate Agreement (BAA) with the organization as defined by HIPAA. Contractors and vendors who provide resident care, reimbursement, or other services to resident beneficiaries of federal and/ or state healthcare programs are subject to the Code of Conduct and must:

- Maintain defined standards for the products and services they provide to us and our residents;
- Comply with all policies and procedures as well as the laws and regulations that apply to their business or profession;
- Maintain all applicable licenses and certifications and provide evidence of sanction screening, current workers compensation, and liability insurance as applicable; and
- Require that their employees comply with the Code of Conduct and the Compliance and Ethics Program and related training as appropriate.

Marketing and Advertising

We use marketing and advertising activities to educate the public, increase awareness of our services, and recruit new Employees and Associates. These materials and announcements, whether verbal, printed, or electronic, will present only truthful, informative, non-deceptive information.

BILLING AND BUSINESS PRACTICES

We are committed to operating with honesty and integrity. Therefore, all Employees and Associates must ensure that all statements, submissions, and other communications with residents, prospective residents, the government, suppliers, and other third parties are truthful, accurate, and complete.

We are committed to ethical, honest billing practices and expect you to be vigilant in maintaining these standards at all times. We will not tolerate any false or inaccurate coding or billing. Any Employee or Associate who knowingly submits a false claim, or provides information that may contribute to submitting a false claim such as falsified clinical documentation, to any payer – public or private – is subject to termination. In addition, legal or criminal action may be taken.

Prohibited practices include, but are not limited to:

Specific activities that are prohibited include:

- Billing for items or services not rendered or not provided as claimed;
- Submitting claims for equipment, medical supplies and services that are not reasonable and necessary (this includes seeking reimbursement for a service that is not warranted by a resident's documented medical condition, i.e., not medically necessary);
- Duplicate billing - billing items or services more than once;
- Providing false or misleading information about a resident's condition or eligibility;
- Knowing misuse of provider identification numbers, which result in improper billing;
- Unbundling (billing for each component of the service instead of billing or using an all-inclusive code);
- Assigning an inaccurate code or resident status to increase reimbursement;
- Clustering (this is the practice of coding/charging one or two middle levels of service codes exclusively, under the philosophy that some will be higher, some lower, and the charges will average out over an extended period.);
- Up coding the level of service for a more expensive service than the one actually performed.
- Failing to identify and refund credit balances;
- Submitting bills without supporting documentation;
- Soliciting, offering, receiving, or paying a kickback, bribe, rebate, or any other remuneration in exchange for referrals; and/or

- Untimely entries into medical records.

If you observe or suspect that false claims are being submitted or have knowledge of a prohibited practice, you must immediately report the situation to a supervisor, the Compliance Official, the Compliance Officer, or call the Compliance Hotline. Failure to report a known prohibited practice will subject you to disciplinary action up to and including termination.

Referrals and Kickbacks

Employees, Associates, and related entities often have close associations with local healthcare providers and other referral sources. To demonstrate ethical business practices, we must make sure that all relationships with these professionals are open, honest, and legal.

Resident referrals are accepted based solely on the clinical needs and our ability to provide the services. Keswick never solicits, accepts offers, or gives anything of value in exchange for resident referrals or in exchange for purchasing or ordering any good or service for which payment is made by a federal health care program. Anything of value includes any item or service of value including cash, goods, supplies, gifts, “freebies,” improper discounts or bribes.

Accepting kickbacks is against our policies and procedures and also against the law. A kickback is anything of value that is received in exchange for a business decision such as a resident referral. To assure adherence to ethical standards in our business relationships, you must:

- Verify all business arrangements with physicians or other healthcare providers or vendors in a written document; and
- Comply with all state and federal regulations when arranging referrals to physician-owned businesses or other healthcare providers.

You cannot request, accept, offer, or give any item or service that is intended to influence – or even appears to influence – the referral, solicitation, or provision of healthcare service paid for by any private or commercial healthcare payer or federal or state healthcare program, including Medicare and Medicaid, or other providers.

Inducements to Prospective Residents

You may not provide anything of value including goods, services, or money to prospective residents or any beneficiary of a federal or state healthcare program that you know or should know will likely influence that person’s selection of a provider of healthcare services.

For the purposes of this policy, anything of value includes but is not limited to any waiver of payment, gift, or free service that exceeds a value of \$10 per item or \$50 annually in total. If you have a question about whether a particular gift or service would be considered “of value,” ask your supervisor or the Compliance Officer.

Copyright Laws

Most print and electronic materials are protected by copyright laws. Employees and Associates are expected to respect these laws and not reproduce electronic print or printed material without obtaining permission as required by the writer or publisher. When in doubt, ask your supervisor.

Financial Practices and Controls

Ensuring that financial and operating information is current and accurate is an important means of protecting assets. Each one of us must make sure that all information provided to bookkeepers, accountants, reimbursement staff, internal and external auditors, and compliance staff is accurate and complete. This includes ensuring the accuracy of clinical documentation which supports our reimbursement. We must also comply with federal and state regulations when maintaining clinical records, accounting records and financial statements, and cooperate fully with internal and external audits.

Fair Dealing

All Employees and Associates must deal fairly with residents, suppliers, competitors, and one another. No Employee or Associate shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Document Creation, Use and Maintenance

Every Employee and Associate is responsible for the integrity and accuracy of documents, records, and e-mails including, but not limited to, resident medical records, billing records, and financial records. No information in any record or document may ever be falsified or altered.

You must not disclose, internally or externally, either directly or indirectly, confidential information except on a need to know basis and in the performance of your duties. Disclosure of confidential information externally must follow Keswick’s policies.

Upon termination of employment, you must promptly return all confidential information, medical and/or business, to Keswick. Examples of confidential business information include potential or threatened litigation, litigation strategy, purchases or sales of substantial assets, business plans,

marketing strategies, organizational plans, financial management, training materials, fee schedules, department performance metrics, and administrative policies.

Voluntary Disclosure

It is our policy to voluntarily report known overpayments and any improper/irregular conduct, including fraudulent conduct, which affects any federal or state healthcare program. Reporting will be completed within the time frames identified under the Patient Protection and Affordable Care Act.

IMPROVING OUR COMMUNITY

Resident/Family Education

Resident/family education promotes healthy behaviors, helps maintain function, and enables residents to be involved in decisions about their own care. Residents or residents' family members' decisions need to be based on full knowledge and understanding of the consequences, risks, benefits and alternatives. Appropriate staff are encouraged to discuss available options openly and honestly with residents and, if indicated, family members and other decision makers, to arrive at care decisions.

Employee Education

Keswick provides most of its education through its orientation and in-service programs. Keswick supports and encourages Employee education through attendance at seminars, continuing education or degree programs.

Education of Associates

Keswick recognizes that, as policy makers, Trustees and Directors of Keswick must have a general understanding of health care and the climate in which long term care organizations function. Medical staff, volunteers and vendors also must be kept abreast of issues relating to the delivery of goods and services to residents. Keswick will provide orientation and education programs where appropriate and otherwise strive to assure that its Associates are well-informed.

Political Relations

Keswick prohibits certain lobbying and political activities by Employees in the name of, or on behalf of, Keswick. Board trustees and directors, officers and Employees may participate personally in, and contribute to, political organizations or campaigns with their own funds, but not as Keswick representatives. Employees may not contribute any Keswick money or property or

the services of any Keswick trustee, director, officer or Employee, to any political candidate, party organization, committee or individual in violation of any applicable law.

Keswick has many contacts and dealings with governmental bodies and officials. It is expected that these dealings be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of government bodies or officials by improper offer of any benefit is absolutely prohibited. Any requests or demands by any government representative for any improper benefit should be reported to the Corporate Compliance Officer or Compliance Hotline.

GETTING HELP AND REPORTING PROBLEMS

Ways to Get Help

As part of our commitment to promoting ethical and legal behavior, Keswick Employees and Associates have a duty to report suspected violation of the law or deviation from ethical standards. Employees and Associates are encouraged to ask questions if the lawful or ethical path is not clear.

Employees should first go to their supervisor when they have a concern or have a question about proper business conduct. However, there may be times when turning to your supervisor is uncomfortable or inappropriate.

Corporate Compliance Officer and Calling the COMPLIANCE HOTLINE

The Corporate Compliance Officer will take all necessary steps to protect callers' confidentiality whenever possible. If you are concerned about confidentiality, you may even call the Compliance Hotline anonymously. If you call the Compliance Hotline, you will be asked for details about your concern so that the Corporate Compliance Officer may investigate the matter, but you will not be pressured to give your name if you do not wish to reveal it. If you call anonymously, you will be assigned a caller number, which you can use to call back and provide follow-up information.

The "COMPLIANCE HOTLINE" at 1.800.211.2713

It is confidential and should be used to report suspected misconduct. It is available 24 hours a day and will be answered by an independent monitoring agency.

No Retaliation

Keswick has a strict policy prohibiting any form of retaliation for reporting suspected misconduct. Any Employee or Associate, who reports a concern in good faith, cannot be subject to retaliation of any sort either indirectly or directly.

Talking It Through

When we keep ethical business dilemmas to ourselves and struggle to address them alone, we may find that the outcome is not the best. When choosing between several options it can be helpful to try to include a variety of people in the decision making process. The Corporate Compliance Officer, as well as co-workers and supervisors are all people we can turn to help us consider our options. So don't be afraid to call a "time-out" and consult the people who are there to help you.

In The End

It is important for each of us to understand the laws, regulations and policies that are central to our duties on the job and to seek help when the path is not clear. The success of Keswick requires each Employee and Associate to be committed to legal and ethical behavior. We must never compromise our ethics or our values in order to meet business objectives. This approach helps ensure the continued success of Keswick and will help produce a working environment that is marked by enthusiasm and pride.



PLEDGE

I have received the Keswick Code of Conduct in accordance with the Compliance and Ethics Program. I acknowledge reading the Code of Conduct. I understand my obligation to perform my responsibilities to Keswick in accordance with the Keswick Code of Conduct.

Signature of Employee or Associate Date _____

Name of Employee or Associate (print)

Revised: November, 2017