

Jawonio, Inc.

Compliance: CODE OF CONDUCT



Mission and Values:

MISSION STATEMENT

“Jawonio is dedicated to advancing the independence, well-being and equality of people with disabilities or special needs.”

The principles of the mission which stress independence, well being and equality:

- Enhance opportunities for consumers to live, work, retire, and socialize in the community.
- Advocate and assist consumers in the pursuit of educational opportunities.
- Assist and advocate for consumers in attending community/recreational/cultural events.
- Advocate and provide for barrier-free community living and vocational domains.
- Ensure the opportunity for consumers to participate in religious practices and civil affairs within the community.
- Protect and encourage the expression of consumer’s civil liberties, such as right to vote, self-expression, and privacy.
- Provide skilled therapeutic services to enhance functional independence.
- Ensure the availability of technology to enhance functional skills.
- Encourage and support consumer’s choices.
- Train staff to be able to provide safe, respectful, and effective services.
- Support consumer growth in a warm and supportive environment.

CORE VALUES

At Jawonio, we respect the importance of each individual by upholding the following values:

- **Honesty and Integrity**

We conduct ourselves by communicating in an open and ethical manner.

- **Inclusion**

We respect diversity and encourage collaboration.

- **Mutual Respect**

We are committed to the promotion of fairness, dignity and compassion for those we serve and employ.

- **Commitment**

We maintain a responsibility to meet the changing needs of the individual and the greater community.

Intent:

Jawonio, Inc.’s Code of Conduct (the Code) applies to all employees and independent contractors.

The Code of Conduct was approved by Jawonio, Inc.’s Board of Directors and is a formal statement of Jawonio, Inc.’s commitment to the standards and rules of ethical conduct.

Jawonio, Inc. is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline employees who violate the Code, including employees who neglect to report a violation.

All employees must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

While the standards addressed in the Code of Conduct are intended to guide employees in the course of their day-to-day responsibilities, they do not replace any other Jawonio, Inc. program policies and procedures. There may be instances that are not addressed by the Code of Conduct or existing policies and procedures. Employees must seek direction from their supervisor, other Jawonio, Inc. supervisory staff or the Compliance Officer in these instances.

Ethics

It is the policy of Jawonio, Inc. to observe all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all employees and contractors must obey the laws and regulations that govern their work and always act in the best interest of the people we serve, their families and Jawonio, Inc.

Guidelines for employees and contractors:

- You are expected to keep management staff informed of what you are doing; to document or record all services or transactions accurately; and to be honest and forthcoming with Jawonio, Inc., regulatory agencies, and internal and external auditors.
- You are expected to comply with Jawonio, Inc.'s policies and procedures, accounting rules, and internal controls.
- You have a duty to be productive during the time that is paid for by Jawonio.
- You are expected to function with honesty in your work for Jawonio, Inc. and with people we serve, providers, suppliers and all others with whom Jawonio, Inc. does business.

Quality Health Care Services

Jawonio's employees and contractors shall strive to deliver quality health care that maintains our reputation for exemplary service delivery.

- Jawonio's employees and contractors shall respect the dignity of all consumers and will treat him or her with consideration, courtesy and respect.
- Jawonio shall only employ or work with persons with proper credentials, experience and expertise. Employees and agents are expected to have those credentials and experience, and should expect other agents to have them.
- It is everyone's job to maintain Jawonio's integrity and reputation.
- Consumers have the right to choose what is done to their body, and by whom. This includes the choice of health care providers.
- Consumers have the right to know what they need to know to make informed decisions. That includes receiving information about Jawonio and its policies, procedures and charges, and who will provide services on behalf of Jawonio.
- No deficiency or error should be ignored or covered up. A problem should be brought to the attention of those who can properly assess and resolve the problem.
- Employees and agents deserve clear instructions about what is expected of them.

- Jawonio's highest priority is the health and safety of our consumers and ourselves. We shall strive to do our jobs so that no harm is caused to ourselves, our consumers, or the public.

Conflict of Interest

- Employees and contractors must not allow any outside financial interest, or competing personal interest to influence their decisions or actions taken on behalf of Jawonio, Inc.
- Employees and contractors must avoid any situation where a conflict of interest exists or might appear between their personal interests and those of Jawonio, Inc. The appearance of a conflict of interest may be as serious as an actual conflict of interest.
- Employees and contractors shall not engage in placing business with any firm in which there is a family relationship may constitute a conflict of interest. Advance disclosure and Board of Directors' approval are required in such a situation.

Guidelines for employees and contractors:

- It is a conflict of interest for you to personally take for yourself, opportunities that are discovered through the use of Jawonio, Inc. property, information or position with Jawonio, Inc.; to use Jawonio, Inc. property or information for personal gain; or to compete with Jawonio, Inc.
- There are many types of situations where potential conflicts may arise. You must promptly report any actual or potential conflicts of interest to your immediate supervisor or directly to the Compliance Officer.

Outside Activities and Employment

- You may not conduct outside activities during work time. Such activities interfere with your regular duties and negatively impact the quality of your work.
- You are a representative of Jawonio, Inc. in your every day life and must represent Jawonio, Inc. positively in the community.
- Outside employment must not conflict in any way with your responsibilities to Jawonio, Inc. or its consumers. You may not compete against Jawonio, Inc., or have any ownership interest in a competitor.
- If you work for a competitor, as in the instance of direct care personnel, said employment must be disclosed to the Director of Human Resources and approval must be sought from the Corporate Compliance officer.

Use of Agency Funds and Resources

- Jawonio, Inc.'s assets are to only be used for the benefit of Jawonio, Inc. and the people we serve. Assets include not only funds, equipment, inventory, and office supplies; but also concepts, business plans and strategies, information about people served, financial information, computer property rights, and other business information about Jawonio, Inc.
- You may not use Jawonio, Inc. assets for personal gain or give them to any other persons or entities, except in the ordinary course of business as part of an approved transaction. All employees, consultants and vendors are personally responsible and accountable for the proper expenditure of Jawonio funds and for the proper use of company property.
- All employees and contractors must obtain authorization prior to committing or spending Jawonio's funds.
- Any improper financial gain to the employee through misconduct involving misuse of Jawonio's or a consumer's property is prohibited, including the outright theft of property or embezzlement of money.

- Medical waste or other hazardous materials shall be disposed of properly.
- Employees and contractors may not use Jawonio's or a consumer's resources for personal or improper purposes, or permit others to do so.
- Surplus, obsolete or junked property shall be disposed of in accordance with Jawonio's procedures. Unauthorized disposal of property is a misuse of assets.

Confidentiality

- During your employment, you may acquire confidential information about Jawonio, Inc., its staff, and people we serve that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and consumer information is very important.
- Employees and contractors shall not use or reveal any confidential information concerning Jawonio or use, for personal gain, confidential information obtained as an employee or contractor of Jawonio.
- Employees and contractors should be honest and forthright in any representations made to consumers, vendors, payers, other employees or agents, and the community.
- All reports or other information required to be provided to any federal, state or local government agency authorized to receive such information, shall be accurate, complete, and filed on time.

Business Dealings Between Jawonio, Inc. And Employees

- Jawonio, Inc. will not be inappropriately influenced with goods or services from any business in which you or your immediate family members have a substantial interest.
- Property and resources of Jawonio, Inc. should only be used for the benefit of Jawonio, Inc. or the people we serve.

Maintenance of Records

- Employees and contractors must record and report all agency, consumer and financial information fully, accurately and honestly.
- Records include, but are not limited to records of the people we serve, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims payment records, correspondence, and any other method of communication.
- Employees or contractors must not omit or conceal any relevant information.

Guidelines for employees and contractors:

- Many of Jawonio, Inc.'s forms are legal documents used to prove that a service was provided, to bill for a service to a consumer, to record a job task, or to record specific happenings. You must document accurately and honestly, and only for those services that you provided or those events you were involved in.

Falsification of Records

- You must not make any false entries in any of Jawonio, Inc.'s records or in any public record for any reason.
- You may not alter any permanent entries in Jawonio, Inc.'s records.
- You may only approve payments or receipts on behalf of Jawonio, Inc. that are described in documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on the agency books, are strictly prohibited.

- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.

Expense Records

- You must always charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project or contract, or the budget status of a particular account or line item.

Retention of Records

- The retention, disposal or destruction of records of or pertaining to Jawonio, Inc. must always comply with legal and regulatory requirements and Jawonio, Inc. policy.
- You may not destroy records pertaining to litigation or government investigations or audit without express written approval of the Compliance Officer.

Protection of Confidential Information

- Jawonio, Inc. has developed policies and procedures to assure that the confidentiality of Jawonio, Inc. information and information about the people we serve is protected and released only with the appropriate authorization or for lawful reasons, in addition to purposes of treatment, payment, and operations.
- All employees and contractors are required to comply with Jawonio, Inc. policies on Confidentiality and the Health Insurance Portability & Accountability Act policies.
- If you have any questions concerning confidential information or Jawonio, Inc.'s policies, contact your immediate supervisor or the Compliance Officer.

Guidelines for employees and contractors:

- You must treat all Agency records and information as confidential.
- You may not release confidential information without the proper authorization. Confidential information includes not only information about the people that we serve and their families, but also non-public information about Jawonio, Inc. that maybe of use to Jawonio, Inc.'s competitors or harmful to Jawonio, Inc. or its customers if released.
- You must protect Jawonio, Inc.'s information and avoid discussing or disclosing Jawonio, Inc. information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside Jawonio, Inc. Furthermore, staff may not share confidential information with anyone, except where required for a legitimate business purpose.
- Jawonio, Inc. information may not be removed from facility property without permission from a supervisor or administrator with proper authority over the information. Ask your supervisor if you are not sure whether certain information is confidential.

Termination of Employment

- You may not use any confidential information gained from your employment with Jawonio, Inc. for your or another company's benefit. You may not take copies of any reports, documents or any other property belonging to Jawonio, Inc. when you leave your employment at Jawonio, Inc.
- Upon termination of employment with Jawonio, Inc., you must return all Jawonio, Inc. property including, but not limited to, copies of documents, notes, and other records containing confidential information; computer disks; ID badges; keys and credit cards.

Information Security

- You are responsible for properly using information stored and produced by all of Jawonio, Inc.'s computer systems.
- Computers, Internet access, email, or other office communications systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing or harmful to others.
- Do not share your system user name or password with another person or allow another to access the computer with your password.
- All employees and contractors are required to comply with Jawonio, Inc.'s Information Technology and Health Insurance Portability and Accountability Act security policies. If you have any questions concerning information security, contact your immediate supervisor or the Compliance Officer.

Fair Dealing

- Conducting business with providers, contractors, suppliers, people we serve, and competitors may pose ethical problems. Employees and contractors are expected to deal fairly with providers, contractors, people we serve, and competitors.
- The Code of Conduct and the following guidelines are intended to help you make appropriate, responsible and correct decisions in these and all matters:

Kickbacks and Rebate

- Kickbacks and rebates in cash, credit or other form are prohibited. They are not only unethical, but in many cases, illegal.

Gifts and Gratuities and Entertainment

- You may not solicit money, gifts, gratitude or any other personal benefits or favors of any kind from providers, contractors, producers, accounts, or people we serve and their families.
- You must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.
- Occasional non-cash gifts from providers, contractors, producers, accounts, that are limited to reasonable meal expenditures or entertainment or that are of nominal value, although not expressly prohibited, are discouraged.
- Occasional nominal non-cash gifts from people we serve and their families are acceptable but must be disclosed to the respective division director.
- You should report any potential conflicts of interest concerning yourself or your family members to the Corporate Compliance Officer.

Agreements with Contractors and Vendors

- Jawonio, Inc. must assure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards, and the applicable compensation, if any, must be reasonable in amount, not be excessive in terms of industry practice and must equal the value of the services rendered.

Improper Use of Funds or Assets

- Use of Jawonio, Inc.'s funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor or the Compliance Officer.

Federal and State Programs

- Jawonio, Inc. is committed to complying with the laws and regulations that govern the federal and state programs that it administers. Policies and procedures, the Compliance Program, and this Code of Conduct are developed to provide guidance in your day-to-day work. You must abide by the policies and procedures and the standards set by Jawonio, Inc.

Governmental Investigations

- There may be times that Jawonio, Inc. is asked to cooperate with an investigation by a federal or state governmental agency, or to respond to a request for information. A request may be formally addressed to Jawonio, Inc. or an individual within the agency. Employees and contractors must report any requests for information or cooperation with an investigation to the Compliance Officer immediately.

Political Activities and Contributions

- Because Jawonio, Inc. is a non-profit organization, it is prohibited from engaging in any political campaign activities and a “substantial” amount of lobbying.

Guidelines for Employees and Contractors:

- Jawonio, Inc. funds and resources, including your work time, may not be used for political contributions or activities.
- You may not act as a representative of Jawonio, Inc. in any political campaign activity. In expressing your personal political views or support or opposition of a candidate for public office, it must be very clear that you are expressing your personal view, support or opposition as an individual and not a representative of Jawonio, Inc.
- Laws and regulations prohibit a “substantial” amount of lobbying. There are allowances for Jawonio, Inc. to advocate its position on public issues. To assure that Jawonio, Inc. does not violate any laws or regulations, or risk losing its tax-exempt status, you must seek prior approval from the Compliance Officer before engaging in any lobbying activities. The Compliance Officer may need to consult with legal counsel on the matter and will need to record the amount of time spent in lobbying activities.

Employment Environment

- Jawonio, Inc. is committed to creating a safe and professional workplace where employees and others are treated with respect and without regard to their race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics. Business integrity, teamwork, trust and respect are Jawonio, Inc.’s most important values.
- Unlawful discrimination or harassment of any sort violates these values.
- Quality consumer care can only be delivered through the use of qualified, competent staff. Jawonio will contribute to an employees’, consultants’ or vendors’ competence by making available continuing job-related education and training (within the limits of its resources).
- Applicants and employees shall be afforded equal employment and advancement opportunities, pursuant to Jawonio's policies.
- Work and safety rules were created to protect us all. Employees and agents are expected to comply with those rules.
- As defined further in its policies, Jawonio strives to maintain a working environment free from all forms of sexual harassment or intimidation. By way of example, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature are serious violations of the standards of conduct and will not be condoned or permitted.

- Jawonio promotes a drug and alcohol free workplace in accordance with its policies.
- Jawonio will not permit any action of retaliation or reprisal to be taken against an employee or contractor who reports a violation of law, regulation, standard, procedure, or policy.

Guidelines for Employees and Contractors:

- All employees are required to support Jawonio, Inc.'s commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace.
- All employees are prohibited from joking about another employee's race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics.
- All employees must exhibit and promote respect, integrity, trust, and teamwork in the workplace and must comply with this policy prohibiting discrimination and harassment in all facets of the Jawonio, Inc.'s work.
- Employees and contractors are expected to conform to the standards of their respective professions and exercise sound judgment in the performance of their duties. Any differences of opinion in professional judgment should be referred to appropriate management levels for resolution in accordance with standard grievance procedures.
- All employees are prohibited from considering someone's race, color, religion, sex, national origin, age, disability, or other protected characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits and other work terms.
- Sexual harassment is prohibited. Sexual harassment includes any form of unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual or sex-based nature.
- You are responsible for understanding Jawonio, Inc.'s policy prohibiting discrimination and sexual harassment. You should consult with an appropriate supervisor or Human Resource administrator if you have questions about your right to a workplace free from unlawful harassment or discrimination or if you have questions about your duty to avoid discrimination.

Seeking Guidance and Reporting Violations

Employees and contractors must report any actual or suspected violations of this Code of Conduct, any applicable law or regulation, or any Jawonio, Inc.'s Corporate Compliance policies and procedures to their immediate supervisor or the Compliance Officer. A Compliance Hotline is also available for confidential or anonymous reporting of such issues. The Compliance Hotline number is (845) 639-3527.

When an actual or suspected violation of this Code of Conduct, any applicable law or regulation, or any agency Corporate Compliance policy and procedure is reported to any agency employee, it must be promptly referred to the Compliance Officer. Steps will be taken to protect confidentiality and anonymity, when appropriate and warranted. Jawonio, Inc. will not tolerate any form of retaliation against a person who makes a good-faith report in accordance with this Code of Conduct.

All employees and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Conduct, any applicable law or regulation, Jawonio, Inc.'s Corporate Compliance policies, procedures or practices.

(See attachment entitled, "Corporate Compliance Information for Contracted Workers & Vendors" for information on the False Claims Act & Whistleblower Provisions.)

Corrective Action and/or Discipline

Any employee or contractor who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, Jawonio, Inc.'s policies, procedures or practices is subject to appropriate disciplinary action, up to and including termination.

Disciplinary action may range from a warning to suspension or discharge, depending upon the nature of the incident and the relevant surrounding circumstances.

Your Responsibilities

- ✓ Attend required training, and read and understand Jawonio, Inc.'s Corporate Compliance Plan, Corporate Compliance Policies and Procedures, and Code of Conduct.
- ✓ Follow Jawonio, Inc.'s Code of Conduct and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.
- ✓ Be alert to any situation that could violate Jawonio, Inc.'s Code of Conduct, policies and procedures, guidelines, and/or federal and state laws and regulations.
- ✓ Promptly report any issues, concerns, violations or suspected violations to your supervisor, other management staff, Director of Human Resources, Compliance Officer, or the Chief Executive Officer.

Feel Free to Contact:

Carol Camenisch Simpson
Corporate Compliance Officer

(845) 708-2000, ext. 1481
Carol.Simpson@jawonio.org