

CODE OF CONDUCT

Jawonio, Inc. (**Jawonio**) requires that all members of the **Jawonio** community, including its employees, contractors, agents, vendors, members of the Board of Directors, volunteers, and employees and others working on behalf of other governmental and private agencies and businesses doing business with **Jawonio** and its related corporations, to conform to the highest ethical standards and to meet or exceed legal obligations in the performance of their efforts on behalf of **Jawonio**. To this end, we have developed a Code of Conduct for the entire **Jawonio** community. The appointment and retention of all members of the **Jawonio** community is contingent upon acceptance and compliance with this Code of Conduct.

Jawonio enjoys a reputation of integrity and excellence in its programs and services. This reputation is one of our strongest assets. It is expected that all members of the **Jawonio** community whose actions could be attributed to the work of **Jawonio** will adhere to the Code of Conduct and to the policies, standards and procedures outlined in this program.

The **Jawonio** Code of Conduct encompasses commitments by **Jawonio**, coupled with related commitments by each member of the **Jawonio** community to uphold the highest standards of ethical behavior and practices on behalf of **Jawonio**.

1. Our commitment to compliance with the law.

Jawonio is committed to conducting its programs and services in a lawful and ethical manner, in full compliance with all federal, state and local laws and regulations. All members of the **Jawonio** community will adhere to the highest standards of conduct through strict observation of all applicable legal and regulatory requirements.

Jawonio will only employ or contract with individuals or entities with proper credentials, experience and expertise. All business communications on behalf of **Jawonio** with outside individuals or entities, including claims for payment or reimbursement of any kind, will be truthful and, where appropriate, substantiated by accurate and complete records.

Neither **Jawonio**, its employees or agents shall pay employees, physicians, or other health care professionals, directly or indirectly, in cash or by any other means, for referrals of patients. Every payment to a referral source must also be supported by proper documentation that the services contracted for were in fact provided.

Employees or agents who perform billing and/or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with federal and state laws and regulations and **Jawonio's** policies.

No claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate or fictitious may be submitted. No falsification of medical, time or other records

that are used for the basis of submitting claims will be tolerated.

Jawonio will bill only for services rendered and which are fully documented in patients' medical records/consumer's chart. If the services must be coded, then only billing codes that accurately describe the services provided will be used.

Jawonio shall act promptly to investigate and correct the problem if errors in claims that have been submitted are discovered.

2. Our commitment to ethical behavior.

Jawonio is committed to ethical business dealings. All members of the **Jawonio** community will adhere to the highest ethical standards of behavior while performing **Jawonio** business, including preparing and maintaining accurate and complete records, and truthful communications with other members of the **Jawonio** community, and with government and private agencies and individuals doing business with **Jawonio**.

Jawonio seeks positive relationships with government programs and third-party payers. Positive relationships require ongoing communication about patient progress and billing.

Employees or agents shall not use or reveal any confidential information concerning **Jawonio** or use, for personal gain, confidential information obtained as an employee or agent of **Jawonio**.

No employee or agent should subordinate his or her professional standards, judgment or objectivity to any individual. If significant differences of opinion in professional judgment occur, then they should be referred to management for resolution.

Employees and agents should be honest and forthright in any representations made to patients, 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 shall be accurate, legible, complete, and filed on time.

Employees and agents must perform their duties in a way that promotes the public's trust in **Jawonio**.

Employees and agents shall be honest in doing their jobs.

3. Our commitment to continuous training and improvement.

Jawonio is committed to the professional development of the entire **Jawonio** community. All members of the **Jawonio** community will have access to all applicable laws, rules, regulations policies and procedures necessary for them to perform on behalf

of **Jawonio**, and will be regularly trained on those laws, rules, regulations, policies and procedures, as well as this Corporate Compliance Program.

4. Our commitment to continuous monitoring and enforcement.

Jawonio is committed to full and ongoing enforcement of this Code of Conduct and of the standards contained in the corporate compliance program. As a condition of employment or appointment, all members of the **Jawonio** community are expected to rigorously comply with all applicable laws, rules, regulations policies and procedures.

All members of the **Jawonio** community will report suspected violations of these standards of conduct to their supervisor, an appropriate departmental head, an appropriate staff member of the Human Resources Department or to the Corporate Compliance Committee. **Jawonio** assures the entire **Jawonio** community that reports of suspected violations may be made without fear of reprisal, retaliation or intimidation, and that confidentiality will be protected within the limits of the law.

All reports of suspected violations will be fairly, thoroughly and promptly investigated by appropriate individuals, and will be promptly resolved.

5. Our commitment to our ethical obligations, mission and purposes free of conflicts of interest.

Jawonio is committed to clarity of our mission and purposes, free of any appearance of conflict or impropriety. **Jawonio** itself will not pursue any business opportunity or take any other action that will require it to engage in illegal or unethical behavior or is reasonably likely to fall outside of **Jawonio's** mission, purposes or powers.

In all their activities on behalf of **Jawonio**, all members of the **Jawonio** community will act in a manner consistent with the agency's mission, purposes, powers, and consistent with the agency's reputation for integrity and excellence. Each member of the **Jawonio** community will ensure that no activity takes place that in any way jeopardizes the tax exemption, licenses, or governmental authorizations of **Jawonio**.

All members of the **Jawonio** community will accomplish their business on behalf of **Jawonio** without engaging in any business, professional or personal activity that would create a conflict of interest, or an appearance of a conflict of interest, without appropriate disclosure and advance approval by the Board of Directors and CEO or their/his/her designee.

Placing business with any firm in which there is a family relationship may constitute a conflict of interest. Advance disclosure and approval are required in such a situation.

Employees and agents should not become involved, directly or indirectly, in outside commercial activities that could improperly influence their actions. For example,

an employee or agent should not be an officer, director, manager or consultant of a potential competitor, customer, or supplier of **Jawonio** without first disclosing that relationship to the Board of Directors, and CEO or their/his/her designee.

Employees and agents should not accept or provide benefits that could be seen as creating conflict between their personal interests and **Jawonio's** legitimate business interests.

Employees and agents should report any potential conflicts of interest concerning themselves, co-workers or family members to the Board of Directors, and CEO or their/his/her designee.

Program and other staff should not have direct contact with vendors unless their input is required in the process of determining choice of vendors. **Jawonio** will notify vendors and employees of this policy.

Please refer to the Rules Relating to Gifts, and Conflict of Interest Policy, which appear on the following pages.

6. Our commitment to respecting property rights.

Jawonio is committed to respecting the property rights of all those with which we do business, including individuals and outside businesses. In their actions on behalf of **Jawonio**, all members of the **Jawonio** community will act in a manner consistent with this respect of the property of others.

Each member of the **Jawonio** community will ensure that all applicable laws, standards and policies regarding the confidentiality of agency records are upheld.

Each member of the **Jawonio** community will ensure that all private information owned by others, but in the custody and possession of **Jawonio**, be held in confidence and not utilized outside of the use contemplated by the owner of the information without the express permission of the owner. This includes prohibition against unauthorized use and / or copying of computer software not contained in the license granted to **Jawonio**, and installation of unauthorized software on agency computers. Employees shall take all reasonable steps to protect computer systems and software from unauthorized access or intrusion.

All employees and agents are personally responsible and accountable for the proper expenditure of **Jawonio's** funds and for the proper use of company property.

All employees and agents must obtain authorization prior to committing or spending **Jawonio's** funds.

Employees and agents may not use **Jawonio's** or a patient's/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.

Any improper financial gain to the employee, or agent, through misconduct involving misuse of **Jawonio's** or a consumer's/patient's property is prohibited, including the outright theft of property or embezzlement of money.

Jawonio's confidential and proprietary information is valuable and should be protected from unauthorized use or exploitation. Employees and agents are expected to respect the intellectual property rights of others with whom we do business.

Employees and agents are expected to report any observed misuse of **Jawonio's** property to management.

RULES RELATING TO GIFTS

The following rules apply to all employees and agents of **Jawonio**:

1. Employees and agents may never accept gifts in the form of cash or cash equivalents from any individual or business entity that does business with **Jawonio**.

2. Employees and agents may never accept gifts of any kind from individuals or business entities who are in the process of competitive bidding for a contract with **Jawonio**, or whose contracts are under review as to whether the contract should be continued.

3. Employees or agents may accept a non-cash gift from a vendor not subject to paragraphs 1 or 2 above; however, any gift with a value in excess of \$50.00 must be reported to the Board of Directors, and CEO..

4. Outside vendors will be notified on an annual basis, in advance of the winter holiday season, of **Jawonio's** policies regarding gifts. In that notice, outside vendors will be requested to refrain from giving gifts to individual **Jawonio** employees or agents. The notice will also suggest that if the vendor wishes to make a gift, it be done to the agency's "holiday fund"; alternately, an in-kind gift can be made for an individual or staff holiday party.

5. All **Jawonio** staff will be notified on an annual basis, in advance of the winter holiday season, of **Jawonio's** policies regarding gifts.