Employee Code of Conduct

OVERVIEW

We require that all our employees conduct themselves according to the highest standards of ethics, integrity, and behavior when dealing with our patients, clients, colleagues, and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law.

This Code establishes the standards of behavior that must be met by all employees. Where these standards are not met, appropriate disciplinary action will be taken. In cases where the breach involves serious misconduct, this may result in dismissal. In cases where a breach of the policy involves a breach of any law, then the relevant government authorities or the police may be notified.

CONDUCT EXPECTED OF ALL EMPLOYEES:

- 1. Provide quality care and quality of life for the Residents and Patients we serve, respect their privacy, the confidentiality of their personal health information, and the circumstances that have placed them in our trust.
- 2. Compliance with all Company and workplace policies, procedures, rules, regulations, and contracts as well as all reasonable and lawful instructions given by or on behalf of the Company.
- 3. Create and maintain accurate, thorough, and timely records of all services, billing, and other business activities. Do not destroy, alter, falsify, or amend any Company records except as may be expressly directed by Company policy.
- 4. Act faithful and diligent, and always pursue the Company's best interests. Devote entire time, attention, and skill during normal working hours and at other times as reasonably necessary for the performance of work duties.
- 5. Be honest and fair in dealings with patients, customers, clients, co-workers, Company management and the public, and treat them with honesty, courtesy, and respect.
- 6. Work in a safe and compliant manner, observe all workplace health and safety rules and responsibilities; refrain from any discriminatory, bullying, or harassing behavior toward patients, customers, clients, coworkers, Company management and the public.
- 7. No statements made to the media about the Company's business, unless authorized to do so by the Company including social media, or any other public platform, that may harm the Company's reputation. Requests for media statements should be referred to Elderwood Administrative Services Marketing Department 1-888-826-9663.
- 8. No bribes, kickbacks, gifts, gratuities, loans, or funds or other benefit from any entity accepted or solicited for personal gain or to influence decision making in connection with employment.
- 9. No outside employment or providing any services to any person or entity that competes with the Company or any of its affiliated or related entities.
- 10. Immediately disclose any potential, perceived or actual conflict of interest (whether direct or indirect) that may give rise to a conflict with the performance of the employee's obligations to the Company, or the Company's business, confidential information or reputational interests. The Company may direct employees to take action to eliminate or reduce any such conflict, and employees must comply with such directions.

- 11. No conduct that causes damage or potential damage to the Company's property or reputation, whether during or after work hours.
- 12. Not coming to work while affected with prohibited drugs or alcohol. No use of prohibited drugs or alcohol in the workplace.
- 13. No discrimination based on personal characteristics including (but not limited to) gender, sex, race, disability, pregnancy, age, marital status, or sexual orientation.
- 14. Dress in an appropriate manner and ensure that appearance is presentable, clean, neat, and tidy, including but not limited to wearing any uniform that is required of you by the Company.
- 15. No use of Company internet or email to send, access and/or download sexually explicit or suggestive material or other offensive or harassing material.
- 16. Maintain the privacy and confidentiality of any personal and confidential information, records or other materials acquired both during employment and after termination of employment with the Company. Always use secure information systems.
- 17. Always maintain in good standing, all credentials, licenses, permits, certifications, or authorities required to perform your job. Practice within the scope of current license or certificate.
- 18. Behave in a way that upholds the Company's iCARE core values and the integrity and good reputation of the Company. Ensure and maintain punctuality and respect the Company's property and resources.
- 19. Cooperate in all government investigations or other processes designed to ensure compliance with the laws that govern us accordance with Company policy. Responding to Government Investigations
- 20. Report without delay, to management or the compliance hotline, 1-855-663-0144, any conduct of other workplace participants which is potentially in breach of any of the above. Retaliation or retribution against any report made in good faith is not tolerated and will be disciplined.

Employees are encouraged to read other relevant Company policies, including:

- Code of Ethics and Conflict of Interest Disclosure Statement
- Company Sexual Harassment Prevention Policy and Acknowledgement
- Non-Intimidation Non-Retaliation No Retribution
- Conflict of Interest Disclosure Policy
- Equal Employment Opportunity and Anti-Discrimination Policy in the Staff Handbook