



ECONOMIC OPPORTUNITY COUNCIL OF SUFFOLK, INC. CODE OF CONDUCT

A. Introduction

The Economic Opportunity Council of Suffolk, Inc. (EOC's) Corporate Compliance Program embodies its commitment to conducting business in compliance with all applicable laws, rules, regulations and other directives of the federal, state and local governments and agencies. Our commitment is to adhere to the code of conduct ("Code of Conduct") set forth below, which is applicable to all affected individuals.

The Code of Conduct is intended to provide general guidelines to assist employees to understand and appreciate the manner in which EOC wishes to conduct business. Although the Code of Conduct can neither cover every situation in the daily conduct of our many varied activities nor substitute for common sense, individual judgment or personal integrity, it is the duty of every staff member to adhere, without exception, to the principles set forth herein.

The Code of Conduct shall be distributed upon hire, to all employees. Employees are responsible for ensuring that their behavior and activity is consistent with this Code of Conduct. This Code is not intended to cover every situation which may be encountered and employees should comply with all applicable laws and regulations whether or not specifically addressed in the Code.

B. Compliance with Laws and Regulations

It is the duty of EOC and its employees to comply with all applicable federal, state and local laws, rules, regulations and standards. Each individual must be aware of the legal requirements and restrictions applicable to his or her respective position and duties. While the duty remains the responsibility of each individual, the agency shall implement programs necessary to foster further awareness of applicable laws and regulations and to monitor and promote compliance with such laws and regulations. Any questions about the legality or propriety of any actions undertaken by or on behalf of EOC should be referred immediately to the Compliance Office or to the CEO.

C. Fraud and Abuse

EOC expects its employees to refrain from any conduct which may violate applicable federal and state laws and regulations, with special emphasis on those related to fraud and/or abuse. These laws generally prohibit:

- (1) the transfer of anything of value in order to induce the referral of participants or any government program business (i.e. Medicaid and other federal or state health care programs); and

- (2) the making of false representations or the submission of false, fraudulent or misleading claims to any government entity or third party payer, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or claims which do not otherwise comply with applicable program or contractual requirements.

D. Professional and Ethical Standards

As professionals, all employees have a duty to support EOC's goals to provide services of the highest quality that respond to the needs of our participants. The services provided must be reasonable and necessary for the care of each participant, and such care must be provided by properly qualified individuals. All such care must be properly documented as required by law and regulations, payer requirements, professional standards and agency policy and procedures. EOC and its employees shall conduct all activities in accordance with the highest ethical standards of their respective professions at all times and in a manner which shall uphold EOC's reputation and standing in the community it serves.

E. Confidentiality

EOC and its employees are in possession of, or have access to, a wide variety of confidential and sensitive information. Participant records, including those that contain Protected Health Information (PHI) are the property of the organization and shall be maintained to serve the participant, necessary health care providers, the organization, payers such as Medicaid and other third party payers in accordance with legal, accrediting and regulatory organization requirements.

The information contained in the health care record belongs to the participant and the participant is entitled to the protection of that information. All participant care information is regarded as confidential and available only to authorized users and employees who may be providing participant care and to third party payers in order to facilitate reimbursement. The operations, activities, business affairs and finances of the organization should also be kept confidential and discussed or made available only to authorized individuals. It is the duty of the organization and its employees to protect the privacy rights of the participants. The organization and its employees shall maintain the confidentiality of participant medical records and information, as well as proprietary information, by actively protecting and safeguarding such information in a manner designed to prevent the unauthorized disclosure of such information. Any use of confidential information must be preceded by appropriately documented consent from the participant. If there are any questions or concerns regarding the disclosure of information, the question or concern should be referred to an individual's supervisor, the compliance officer, or the CEO.

F. Business Practices

Agency business practices must be conducted with honesty and integrity and in a manner that upholds the organization's reputation with participants, payers, vendors, competitors and the community. The organization expects its employees to be loyal to agency interests. Employees should not use their positions to profit personally or to assist others in profiting in any way at

the expense of the organization. Employees must refrain from activities which create conflicts of interest with EOC or which give the appearance of impropriety. Employees involved in business transactions on behalf of the organization shall not offer or pay, or solicit or receive any gifts, favors or other improper inducements in exchange for influence or assistance in a transaction or the referral of business. If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, the doubt or concern should be referred immediately to an individual's supervisor, the compliance officer or the CEO, as appropriate.

When EOC decides to enter into an agreement or arrangement with any entity or practitioner to provide goods or services, that decision must be free of any improper influence. Thus, any employee involved in the decision-making process with respect to such transactions who believes that they or a family member may have a significant financial interest in any entity that:

- (i) engages in business or maintains a relationship with the organization;
- (ii) provides to, or receives from the organization participant referrals, or;
- (iii) competes with the organization;

must notify their immediate supervisor and the compliance officer so the potential conflict can be reviewed. In this way, the organization can be assured that business relationships are free from improper influences.

G. Employment Practices

Non-discrimination

EOC provides equal opportunity for employment and advancement to all employees and applicants for employment. EOC does not discriminate against any individual based on race, creed, ancestry, citizenship status, religion, color, age, national origin, political belief, sexual orientation, gender, gender identity or self-image, gender appearance, behavior or expression, transgender or non-binary status, marital status, Veteran status, disability, prior arrest or conviction history or any other characteristic or status protected by law in employment decisions including recruitment, hiring, compensation, fringe benefits, staff development and training, promotion or transfer, lay-off or termination, or any other condition of employment. EOC is committed to fostering diversity at all levels. The organization is committed to providing participant care and a workplace environment which emphasizes the dignity and respect of every individual. In that regard, harassment and/or other types of prohibited discrimination in any form or context will not be tolerated.

Drug-free, Smoke-free Workplace

EOC is committed to providing an efficient, healthy, and safe workplace. The agency maintains a drug and alcohol-free workplace and will not tolerate on its premises the manufacture, dispensation, possession, distribution, or use of illicit drugs or alcohol, or an employee being under the influence of illicit drugs or alcohol. All EOC program building/sites must be free of the effects of smoke-contaminated air; the agency does not permit smoking/vaping anywhere inside its facilities.

Violence-free Workplace

EOC and its employees will comply with federal, state and local laws and regulations that promote the protection of health and safety. Violence in the workplace will not be tolerated and such behavior will result in immediate disciplinary action and/or termination. Employees are expected to report workplace injuries or any situation presenting a danger of injury immediately to their supervisors.

H. Reimbursement

EOC and its employees have a duty to create and keep records and documentation which conform to legal, professional and ethical standards. Employees involved in delivering reimbursable services, or in billing and reimbursement for services, shall ensure that billings for reimbursement for care are reasonable, necessary and appropriate, that services are provided by properly qualified persons, and that services are billed correctly and supported by adequate documentation. All claims for reimbursement to government and private insurance payers must be true and accurate and conform to all applicable laws and regulations. The organization and its employees are prohibited from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious, fraudulent or otherwise not in compliance with applicable laws and regulations.

I. Administration and Application of this Code of Conduct

EOC expects that the Code of Conduct will be integrated into the daily activities of its employees. The Code of Conduct is in addition to, and does not limit, specific policies and procedures of the organization. Employees must perform their duties in accordance with all such policies and procedures.

It is the duty of all affected individuals to uphold the standards set forth in the Code of Conduct and to report violations by following the reporting procedures outlined in the Corporate Compliance Manual. Alleged violations of the Code of Conduct or other policies or procedures of the organization will be investigated. The organization will make efforts to maintain the confidentiality of the identity of any individual who reports perceived or actual violations. However, confidentiality of identity cannot be guaranteed.

J. Non-Retaliation

It is the duty of all employees to report, in good faith, concerns about actual or potential violations of the Code of Conduct or Corporate Compliance Program. Supervisors, managers, and employees are not permitted to engage in retaliation, retribution, intimidation, or any form of harassment directed against an employee who reports a compliance concern. Anyone who is involved in any act of retaliation, retribution or intimidation against an employee that has reported suspected misconduct in good faith will be subject to disciplinary action up to and including termination.

K. Violations of the Code of Conduct

Adherence to and promotion of the Code of Conduct and Corporate Compliance Program will be a factor in evaluating the performance of employees, including supervisory, managerial and administrative personnel. Failure to abide by the Code of Conduct or the guidelines for behavior

which the Code of Conduct represents may lead to disciplinary action. Disciplinary action will be determined on a case-by-case basis and may, in the discretion of the organization, range from a warning to termination. If EOC determines that a violation may have included criminal violations of law or regulation, the organization will seek the advice of counsel and cooperate with law enforcement authorities in connection with any investigation and prosecution of the offender. Employees should report any violation of the Code of Conduct to their immediate supervisor, the compliance officer and/or anonymously via Red Flag Reporting.

Red Flag Reporting is particularly helpful for staff who prefer not to report such matters to their supervisor because they:

- i. believe that they may be involved in the actual or perceived violation;
- ii. prefer to remain anonymous;
- iii. have a legitimate reason to be concerned about reprisal; or
- iv. previous reports have not been acted upon

Employees are able to use it for any reason, however.

Red Flag Reporting Contact Information

Via internet: www.RedFlagReporting.com

Via telephone: 1-877-647-3335

When asked, the agency code is: 6312892124

While staff are under no obligation to disclose their name, supplying it may assist in the investigation of the report. Please note that it is an explicit violation of the policy to retaliate in any way against an employee who, in good faith, reports an actual or potential violation of applicable laws, rules, regulations, or the Code of Conduct.