

Barclay Friends Compliance Program and Code of Conduct

Scope

The Barclay Friends Compliance Program covers the compliance concerns, laws and regulations that are relevant to a Long Term Care Community that provides a wide range of healthcare services. This includes but is not limited to Medicare and Medicaid regulatory concerns, guidelines from the Office of Inspector General, Internal Revenue and the Office of Civil Rights of the Department of Health and Human Services, as well as other regulatory and business concerns.

The scope of the program includes:

Guidelines that have been developed for prevention of, and when required, response to identified compliance concerns. This includes an annual review of the Compliance Program and modifications to the Program as appropriate.

Structure that includes appropriate disciplinary monitoring and review of potential fraud and abuse concerns, are conducted to identify need for corrective action as well as additional training.

Policies and procedures that guide Barclay Friends in appropriate business practice and promote compliance with laws and governmental regulations. Training programs are mandatory for staff to ensure understanding of the Code of Conduct. All employees of Barclay Friends receive a copy of the Code of Conduct and complete a written acknowledgement of its receipt.

Mechanisms established to provide staff members with a means to report potential noncompliance concerns or other areas of concern without fear of retribution.

A process for corrective action that includes appropriate disciplinary measures, to address any concerns of noncompliance; and

Any questions regarding the policies in this handbook or references should be directed to your immediate supervisor, the Compliance Liaison or member of the Compliance Committee of Barclay Friends, or the Compliance Officer.

STRUCTURE AND ORGANIZATION

The Board of Directors of Barclay Friends has established the following structure, reporting relationships and responsibilities to oversee the administration of our Corporate Compliance Program and to ensure that all potential concerns for violations identified by staff members or other team members are investigated and addressed. Barclay Friends has engaged Friends Services for the Aging (FSA) to assist in the oversight of the Corporate Compliance Program. FSA in conjunction with Brethren, Mennonite and other Quaker organizations, all involved in providing services to the elderly, has established a collaborative Compliance Program known as the Peace Church Compliance Program (PCCP).

The Compliance Officer of FSA (currently Karla Dreisbach) works closely with the Board of Directors of Barclay Friends, the Executive Director and the Compliance Liaison to design, implement and oversee Barclay Friends' efforts in establishing, maintaining and monitoring compliance and privacy within the organization. In addition, the Compliance Officer has periodic reporting responsibility to the Board of Directors of Barclay Friends.

Board Resident Care/Compliance Committee

The Barclay Friends **Board Resident Care/Compliance Committee** (RCCC) reviews and monitors the systems, programs and activities related to quality resident care, corporate compliance and integrity. and the RCCC reports to the full Board. Members of the committee are members of the Barclay Friends Board of Directors as appointed by members of the Board of Directors. The Committee provides oversight to the Corporate Compliance program, reviews minutes of the quarterly Management Compliance Committee, reviews reports of internal monitoring and auditing along with other survey information, policies and procedures, reviews the hotline activity if any, and approves the Corporate Compliance policies and procedures, and any changes to the Code of Conduct.

Management

The Executive Director is responsible for creating a culture that values and emphasizes compliance and integrity and ensures privacy. The Board of Directors has appointed the Executive Director to serve as the High Level Official in the PCCP. As a central part of this role, the Executive Director serves on the Compliance Oversight Council and participates in the selection of the Oversight Committee that guides the compliance program.

The Resident Services Administrator has been appointed by the Board of Directors of Barclay Friends as the PCCP **Compliance Liaison**. The Resident Services Administrator is responsible for coordinating and monitoring compliance activities in conjunction with the Compliance Officer and the Barclay Friends Management Compliance Committee. These activities include the quarterly audits, responses to hotlines and overseeing the internal compliance committee. The Resident Services Administrator also functions as the Privacy Officer of Barclay Friends.

The Compliance Liaison Group has been created for the purpose of enhancing communication and share best practices among the Compliance program participants. This group meets 2 or more times a year and is chaired by the Compliance Officer or designee.

The Management Compliance Committee is comprised of members of management of Barclay Friends. The Resident Services Administrator is the chair for this committee. The Management Compliance committee meets on a quarterly basis.

The management **Performance Improvement** and **Risk Management Committees** are part of the comprehensive compliance process to achieve excellent outcomes.

The Performance Improvement Committee focuses on continuous quality improvement that involves measuring the functioning of important processes and services and identifying those changes that enhance performance. These changes are incorporated into new or existing work processes, products and services, and performance improvement is monitored to ensure that improvements are sustained. Focus is on outcomes of care, treatment and services, and is conducted in a planned systematic, and organization wide approach.

The Risk Management Committee focuses on proactive risk assessment involving residents, staff and environmental safety review and analysis, thus reducing factors that contribute to unanticipated adverse events and/or outcomes. Those items that are identified as requiring change and/or monitoring are referred to the Performance Improvement Committee to track outcomes and ensure improvements are sustained.

Barclay Friends

Code of Conduct Handbook

Dear Barclay Friends Colleague:

The Board of Directors, along with the management team of Barclay Friends, is strongly committed to providing the highest quality of care to our residents. Barclay Friends is dedicated to maintaining and upholding the highest ethical standards among all team members: board members, management, staff, physicians, vendors and all other individuals.

Our Code of Conduct is an integral part of Barclay Friends commitment to a principled work environment. It highlights our standards of proper legal, ethical and professional behavior and describes how team members can communicate any legal, ethical or quality concerns so that they may be swiftly resolved.

Our Code of Conduct is not meant to cover every possible situation. As a team member, you are expected to use your own good judgment and abide by the standards of your profession as well. If you have any questions about this Code of Conduct, you are encouraged to talk with your supervisor.

Each team member is a vital link in ensuring the integrity of Barclay Friends. Barclay Friends' commitment to excellence is the foundation of our organization and the strength that makes it successful. Each team member has a responsibility to fulfill ethical, legal and professional responsibilities.

Thank you for doing your part by following our Code of Conduct and for continuing to work in a manner that achieves the goals of our organization.

J. Carol Hanson

Executive Director

Barclay Friends

Mission

Reflecting the Quaker concern for older people, our mission is to continuously improve care of the aging across the continuum of services we provide. We aspire to the highest professional humanitarian standards while providing care and services in a supportive and compassionate atmosphere.

Vision

We envision Barclay Friends as a premier advocate, initiator, and facilitator of services for older adults. Through an integrated continuum of care, and in partnership with our community, we will ensure services that enhance quality of life.

Scope

We are a Community that provides a continuum of care in residential, assisted living and skilled nursing settings. This code applies to every person at every level of the organization. This includes employees, our board of directors, volunteers, independent contractors, subcontractors and vendors who may provide or be involved with healthcare or billing. The term Resident refers to an individual who receives the various types of healthcare, and services that Barclay Friends provides.

Values

In accord with the principles of Friends,

- We hold the worth of each individual as central
- We promote independence and dignity for all residents
- We believe residents are best served by a harmonious work force that is concerned, enthusiastic and dedicated
- We are committed to continuing education and support of staff, residents, families, and board members
- We operate on a not-for-profit basis, maintain high standards and provide appropriate compensation for staff
- We strive to be alert to emerging needs in our area and innovative in our responses

Thus, by example, we hope to improve care of the aging in the wider community.

Barclay Friends is a Community licensed by the Pennsylvania Department of Insurance, Pennsylvania Department of Public Welfare and the Pennsylvania Department of Health. Our services include:

Licensed for Skilled Nursing

Licensed for Assisted Living

Residential Living

The CODE OF CONDUCT_ is supported by the policies and procedures of Barclay Friends.

Barclay Friends Code of Conduct

Introduction

The Code of Conduct (“The Code”) is the foundation of the Barclay Friends Compliance Plan. The Code of Conduct is a guide to appropriate workplace behavior, to help you make the right decisions if you are not sure how to respond to a situation. This Code applies to everyone at Barclay Friends from entry-level staff to upper management, the board of directors, contractors and vendors. Barclay Friends and its staff must comply with both the spirit and the letter of all federal, state and local laws and regulations that apply to the healthcare and other services that the organization provides, as well as all laws that apply to Barclay Friends’ business dealings. Violations of these laws and regulations can result in severe penalties for Barclay Friends and individuals including financial penalties, exclusion from participation in government programs and in some cases imprisonment.

As staff members of Barclay Friends, we share a commitment to legal, ethical and professional conduct in everything that we do. We support these commitments in our work each day, whether we care for residents, order supplies, prepare meals, keep records, take physician orders, pay invoices or make decisions about the future of our organization. The success of Barclay Friends as a provider of healthcare depends on you, our personal and professional integrity, our responsibility to act in good faith and our obligation to the right things for the right reasons. The Compliance Plan provides principles, standards, training and tools to guide our staff in meeting their legal, ethical and professional responsibilities. As a staff member, you are responsible for supporting the Compliance Plan in every aspect of your workplace behavior. Your performance review includes understanding and adhering to the compliance plan as it applies to your job.

This handbook describes the Barclay Friends Code of Conduct. It supplements your Employee Handbook and the specific Policies and Procedures that apply to your job. The Code of Conduct discusses the importance of

Regulatory Excellence – complying with federal and state laws, regulations and guidelines that govern healthcare, housing and other services we provide.

Standard of Care – providing quality, compassionate, respectful and clinically appropriate care.

Professional Excellence – maintaining the highest ethical standards of healthcare and business practices.

A Shared Responsibility

Because we are in the business of caring and providing services for others, it is critical that each of us adheres to appropriate standards of behavior. As individuals and as an organization we are responsible to many different groups. We must act ethically and responsibly in our relations with:

- Board of Directors
- Residents and their families
- Colleagues and coworkers
- Volunteers and affiliated colleagues
- Healthcare payors, including the federal and state governments
- Regulators, surveyors and monitoring agencies
- Physicians
- Vendors and suppliers
- Business associates
- Communities we serve

Any compromise in our standards could harm our residents, our coworkers and our organization. Like every organization that provides healthcare, we do business under very strict regulations and close governmental oversight. Fraud and abuse are serious concerns. Sometimes even an innocent mistake can have significant consequences that could result in substantial penalties to Barclay Friends.

You are required to complete training on the Code of Conduct and the compliance process as a condition of employment at Barclay Friends and you must follow the Code to remain employed. The Code of Conduct sets forth mandatory standards. Every staff member is responsible for ensuring that they comply with the Code and all Barclay Friends' policies and procedures. Any staff person who violates any of these standards and or policies and procedures is subject to discipline up to and including termination of employment.

A Personal Obligation

As we each are responsible for following the Code of Conduct in our daily work, we are also responsible for enforcing it. This means that you have a duty to report any problems you observe or perceive, regardless of your role at Barclay Friends.

As a staff member, you must help ensure that Barclay Friends is doing everything practical to comply with applicable laws. If you observe or suspect a situation that you believe may be unethical, illegal, unprofessional or wrong, or you have a clinical, ethical or financial concern, you must report it. You are expected to satisfy this duty by complying with the Three-Step Reporting Process and Pennsylvania required reporting obligations, under Department of Public Welfare and Department of Health.

Barclay Friends COMPLIANCE LINE

Barclay Friends has a specific communication process for reporting compliance concerns.

The Three Step Reporting Process

First, talk to your supervisor. He or she is most familiar with the laws, regulations and policies that relate to your work.

Second, if you are not able to talk to your supervisor, seek out another member of the management team or someone from human resources.

Third, if you still have a concern, contact the Resident Services Administrator or member of the organizations compliance committee. If none of the above steps resolves your questions or concerns, or if you prefer, call the toll free Barclay Friends Compliance line at 1-800-211-2713 for assistance. All calls are confidential and you may call anonymously if you choose.

You can make a report in good faith to the Barclay Friends Compliance line without fear of reprisal, retaliation or punishment for your actions. Anyone, including a supervisor who retaliates against a staff member for contacting the Compliance Line or reporting compliance concerns in another manner will be disciplined.

The Barclay Friends Compliance Line is staffed by an outside agency and is available 24 hours, 7 days a week. Each call is investigated and kept confidential to the highest degree possible.

Regulatory Excellence

Because we are in healthcare, we must follow the many federal, state and local laws that govern our business. Keeping up with the most current rules and regulations is a big job – and an important one. Barclay Friends staff members are responsible for learning and staying current with the federal, state and local laws, rules and regulations, as well as the policies and procedures that apply to their jobs.

Billing and Business Practices

Barclay Friends is committed to operating with honesty and integrity. Therefore, Barclay Friends' staff members 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.

Barclay Friends is committed to ethical, honest billing practices and expect every staff member to be vigilant in maintaining these standards at all times. Barclay Friends will not tolerate any deliberately false or inaccurate billing. Any staff member 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:

- Billing for services or items that were not provided or costs that were not incurred
- Duplicate billing - billing for item or services more than once
- Billing for items or services that were not medically necessary
- Assigning an inaccurate code or resident status to increase reimbursement
- Providing false or misleading information about a residents' condition or eligibility
- 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
- Unlawfully inducing business associates

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 Liaison, the Compliance Officer or the Compliance Hotline.

Referrals and Kickbacks

Barclay staff members 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.

Barclay Friends accepts resident referrals based solely on the clinical needs and our ability to provide the services required by the resident. Barclay Friends makes referrals based solely on clinical needs and the recipient's ability to provide the identified services. Barclay Friends never solicits, accepts offers or gives kickbacks of any kind.

A "kickback" is an item or service of value including cash, goods, supplies, gifts, "freebies" or bribes, that are received in exchange for a business decision such as a resident referral. Accepting kickbacks is not only against Barclay Friends' policies and procedures but also against the law. To assure adherence to ethical standards in our business relationships, staff members must:

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

Staff members cannot request, accept, offer or give any item or service that is intended to influence, or even appears to influence, a healthcare service paid for by any private or commercial healthcare payer or federal or state healthcare program, including Medicare and Medicaid, or other providers.

Copyright Laws

Print and electronic materials are protected by copyright laws. Barclay Friends staff members are expected to respect these laws and not reproduce electronic print or print material without the permission from the writer or publisher.

Financial Practices and Controls

Barclay Friends must ensure that its financial and operating information is current and accurate as an important means of protecting its assets. All staff members must ensure that all information given to bookkeepers, accountants, reimbursement staff, internal and external auditors and compliance staff is accurate and complete. We must also comply with federal and state regulations when maintaining accounting records and financial statements and cooperate fully with internal and external audits.

Fair Dealing

All Barclay staff members must deal fairly with Barclay Friends' residents, suppliers, competitors and other staff members. No staff member, manager or director shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Protection and Proper Use of Barclay Friends Assets

All Barclay Friends' staff members must protect the assets of Barclay Friends and ensure their authorized and efficient use. Theft, carelessness and waste have a direct impact on the organizations viability. All Barclay Friends' Assets must be used solely for legitimate business purposes.

Document Creation, Use and Maintenance

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

Examples of confidential business information includes 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.

Staff members must not disclose, internally or externally, either directly or indirectly, confidential information except on a need to know basis and in the performance of their duties on behalf of Barclay Friends. Staff members must never disclose confidential information externally unless expressly directed to do so by legal counsel. Upon termination of employment with Barclay Friends, staff members must promptly return all confidential information to Barclay Friends.

Licensure and Certification

Barclay Friends is committed to ensuring that only qualified professionals provide care and services to residents. Practitioners and other professionals treating Barclay Friends' residents must abide by all applicable licensing, credentialing and certification requirements. In addition, Barclay Friends makes every effort to validate licenses and certification through the appropriate state or federal agency and screens all employees through the Office of Inspector General (OIG) and General Services Administration (GSA) data bases. Both the OIG and GSA are part of Federal Health and Human Services (HHS).

Voluntary Disclosure

It is the policy of Barclay Friends to voluntarily report all fraudulent conduct it uncovers that affects any federal or state healthcare program.

Government Investigations

Barclay Friends is committed to cooperating with any governmental inquiry, audits or investigations. Barclay Friends encourages staff members to cooperate with such requests, conscious of the fact that staff members have the following rights; (1) staff members have the right to speak or decline to speak, as all such conversation is voluntary; (2) staff members have the right to speak to an attorney before deciding to be interviewed; and (3) staff members can insist that an attorney be present if they agree to be interviewed. In complying with Barclay Friends' policy you must not:

- Lie or make false or misleading statements to any government investigator or inspector
- Destroy or alter any records or documents in anticipation of a request from the government or the court
- Attempt to persuade another team member or any person to give false or misleading information to a government investigator or inspector
- Be uncooperative with a government investigation.

If you receive a subpoena or other written request for information from the government or a court, contact your supervisor, the Compliance Liaison or the Compliance Officer before responding.

Standard of Care

At Barclay Friends, 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.

Resident Rights

Residents receiving healthcare and other services at Barclay Friends have clearly defined rights. To honor these, we must:

- Make no distinction in the admission, transfer or discharge of a resident, or in the care we provide on the basis of race, gender, age religion, national origin, disability, color, marital status, veteran status, medical condition, sexual orientation or other protected class status, insurance or financial status.
- Treat all residents in a manner that preserves their dignity, autonomy, self-esteem and civil rights.
- Protect every resident from physical, emotional, verbal or sexual abuse or neglect
- Protect all aspects of resident privacy and confidentiality
- Respect clients' personal property and money and protect it from loss, theft, improper use and damage
- Respect the right of residents and their legal representatives to be informed of and participated in decision about their care and treatment
- Respect the right of residents and/or their legal representatives to access their medical records as required by the Health Information Accountability and Portability Act (HIPAA).
- Recognize that residents have the right to consent or refuse care and the right to be informed of the medical consequences of such refusal
- Protect residents' right to be free from physical and chemical restraints
- Respect the residents' right to self-determination and autonomy.

Abuse and Neglect

Barclay Friends will not tolerate any type of resident abuse or neglect – physical, emotional, verbal or sexual. Resident must be protected, not only from staff members, but also from other staff members, family members, legal guardians, friends or any other person. This standard applies to all residents at all times. The state of Pennsylvania defines abuse as the following:

Abuse – the infliction of injury, unreasonable confinement, intimidation or punishment with resulting physical harm or pain or mental anguish, or deprivation by an individual, including a care taker of goods or services that are necessary to attain or maintain physical, mental and psychosocial well-being. This presumes that any instance of abuse of residents, even those in a coma, cause physical harm, or pain or mental anguish. The term includes the following:

- Verbal Abuse - Any use of oral, written, or gestured language that willfully includes disparaging and derogatory terms to clients or their families, or within their hearing distance, regardless of age, ability to comprehend or disability.
- Sexual Abuse – Includes sexual harassment, sexual coercion or sexual assault.
- Physical Abuse – Includes, but is not limited to, hitting, slapping, pinching or kicking. The term also includes controlling behavior through corporal punishment or deprivation.
- Mental Abuse – Includes, but is not limited to, humiliation, harassment, threats of punishment or deprivation.
- Involuntary Seclusion – Includes separation of a resident from other residents, from his or her room, or confinement to his or her room against the resident's will or the will of the resident's legal representative.
- Neglect – The deprivation by a caretaker of goods or services which are necessary to maintain physical or mental health.

Any staff member 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 under the mandatory reporting requirements in the state of Pennsylvania.

Resident Confidentiality

Every staff member must treat all resident information, including any documents or records that contain client-identifying information, medical records and charts as confidential. Staff members must use and disclose medical, financial or personal information only in a manner consistent with Barclay Friends' HIPAA Privacy policies and procedures and state and federal law.

Resident Property

Staff members must respect residents' personal property and protect it from loss, theft, damage or misuse. Staff members who have access to property or funds must maintain accurate records and accounts

Providing Quality of Care

As a Long Term Care Community, our primary commitment is to provide the care, services and products necessary to help each resident reach or maintain his or her highest possible level of physical, mental and psychosocial well-being. Barclay Friends has policies and procedures and provides training and education to help each staff member strive to achieve this goal. You will learn about policies and procedures specific to your job responsibilities as part of your employment orientation and training.

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 that the residents' ongoing needs are being met.
- Providing only medically necessary, physician prescribed services and products that meet the residents' clinical needs.
- Confirming that services and products (including medications) are within accepted standards of practice for the residents' 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 residents' 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.
- Monitoring and improving clinical outcomes through a Quality Improvement Committee with established benchmarks.

Physician Services/Medical Director

Barclay Friends is committed to providing comprehensive, medically necessary services for its residents. The Medical Director provides oversight to physicians and other medical services as defined by state and federal regulations. Barclay Friends compensates the Medical Director at a fair market value for the services he or she provides. The Medical Director oversees the care and treatment policies and is actively involved in the quality improvement committee.

Professional Excellence

The professional, responsible and ethical behavior of every staff 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, everyday.

Hiring and Employment Practices

As an organization, Barclay Friends is committed to fair employment practices. When hiring and evaluating, Barclay Friends:

- Complies 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 or disability. All promotions, transfers, evaluations, compensation and disciplinary actions follow this policy.
- Conducts employment screenings to protect the integrity of our workforce and welfare of our residents and staff members.
- Requires all staff members who need licenses or certifications to maintain their credentials in compliance with state and federal laws; documentation of current licenses or certifications must be provided

Employee Screening

Barclay Friends is prohibited by federal law from employing or retaining or contracting with anyone who is excluded from any federal or state funded programs. Barclay Friends has implemented screening procedures conducted prior to hire, and minimum of annually thereafter, to identify such individuals. These standards also apply to temporary healthcare workers. Barclay Friends policies and procedures are intended to ensure that Barclay Friends does not contract with, employ, or bill for services ordered, rendered or supervised by anyone:

- Confirmed with a positive drug test.
- Convicted of a violent crime, including assault, abuse or rape.
- Convicted of a criminal offense related to healthcare, including fraud, neglect or abuse of clients.
- Convicted of a felony in the preceding seven years.
- Convicted of an offense considered exclusionary by state statutes regulation or standard.
- Excluded from or ineligible to participate in federal healthcare programs.
- Disbarred or excluded by a duly authorized licensing agency.
- Listed on the Federal Terrorist list maintained by the Department of Treasury, Office of Foreign Asset Control.

As long as you are employed or affiliated with Barclay Friends, you must immediately report to your supervisors if you are convicted of an offense that would preclude employment in a healthcare facility, if action has been taken against your license, or if you are excluded from participations in any federal or state healthcare program. Any staff members who are alleged to have, or has committed a serious criminal act will be suspended or, if convicted of a felony, terminated.

Employee Relations

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

- Refrain from any form of sexual harassment or violence in the workplace.
- Treat all colleagues and coworkers with equal respect, regardless of their national origin, race, color, religion, sexual orientation, age, gender identity or disability.
- Protect the privacy of other staff members 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.

Workplace Violence

As a Barclay Friends employee, you have the right to work in a safe environment. Violence, abuse or aggressive behavior will not be tolerated.

Workplace Safety

Maintaining a safe workplace is critical to the well-being of our residents, visitors and coworkers. That is why Barclay Friends has developed policies and procedures that describe the organizations safety requirements. Every Barclay Friends staff member should become familiar with safety regulations and emergency plans regarding fire and disaster in their work area.

In addition to organization policies, Barclay Friends must abide by all environmental laws and regulations. You are expected to follow organization 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 report it to your supervisor immediately.

Drug and Alcohol Abuse

Barclay Friends is committed to maintaining a workforce dedicated and capable of providing quality resident services and performing other applicable duties. To that end, Barclay Friends prohibits staff members from consuming any substance that impairs their ability to provide quality services or otherwise perform their job duties.

Staff members may never use, sell or bring on company property, alcohol, illegal drugs and/or narcotics or report to work under the influence of alcohol, illegal drugs and/or narcotics. For staff members who appear to have work performance problems related to drug or alcohol use, Barclay Friends will conduct a drug and alcohol screening and take appropriate action if necessary.

Barclay Friends prohibits illegal, improper or unauthorized use of any controlled substance that is intended for a resident. If a staff person becomes aware of any improper diversion of drugs or medical supplies, the staff member must immediately report the incident to his or her department supervisor, the compliance liaison, the Compliance Officer or the Compliance Line.

Organization Relations

Professional excellence in organizational relations includes:

- Maintaining company privacy and keeping Barclay Friends proprietary information confidential.
- Avoiding outside activities or interests that conflict with responsibilities to Barclay Friends and reporting such activity or interest prior to and during employment.
- Allowing only designated management staff to report the organization to the public or media.
- Requiring that Barclay Friends comply with the licensing and certification laws that apply to its business.

Proprietary Information

In the performance of their duties, staff members may have access to, receive, or be entrusted with confidential and/or proprietary information, that is owned by Barclay Friends and that is not presently available to the public. This type of information should never be shared with anyone outside of the organization without authorization.

Examples of proprietary information that should not be shared include:

- Resident and staff member 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
- Costs or any kind of financial information
- Market information, marketing plans or strategic plans

Gifts

Staff members may not accept any tip or gratuity from residents; neither may they receive gifts from nor give gifts to residents; nor may they borrow money from or lend money to residents; nor may they engage with residents in the purchase or sale of any item. Staff members may not accept any gift from a resident under a

will or trust instruments except in those cases where the staff member and resident are related by blood or marriage.

Staff members 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 the staff member and resident are related by blood or marriage

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. 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 Barclay Friends.
- 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 Barclay Friends.
- Participating in transactions that put your personal interests ahead of Barclay Friends or cause loss or embarrassment to the organization.
- Taking a job outside of the organization that overlaps with your normal working hours at Barclay or interferes with your job performance.
- Working for Barclay Friends and another vendor that provides goods or services to Barclay Friends at the same time.

All staff members must ensure that they remain free from actual or perceived conflicts of interest.

Use of Barclay Property

Property of Barclay Friends, which includes but is not limited to, office supplies, computers and company vehicles, represents a significant expense and should only be used for legitimate business purposes. Staff members must ensure that they:

- Only use the property of Barclay Friends for the organizations business, not personal use.
- Exercise good judgment and care when using Barclay supplies, equipment and other property.
- Respect copyright and intellectual property laws; never copy or down load software.

Computers and the Internet

Staff members are expected to use Barclay computers, email and internet systems appropriately and according to the established policy and procedure. Staff members are not permitted to use the internet for improper or unlawful activity or download or play games on Barclay Friends' computers.

Internet use can be tracked and Barclay Friends can and will monitor how staff members use their time on the Internet.

Vendor Relationships

Barclay Friends takes responsibility for being a good client and dealing with vendors honestly and ethically. Barclay is committed to fair competition among prospective vendors and contractors for our business. Arrangements between Barclay Friends and its vendors must always be approved by management. Certain business arrangements must be detailed in writing, approved by management and the compliance officer or designee. Agreements with contractors and vendors who receive resident information, with the exception of

care providers, will require a Business Associate Agreement with the organization as defined by Health Insurance Portability and Accountability Act. 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 Barclay Friends Code of Conduct and must:

- Maintain defined standards for the products and services they provide to Barclay Friends and the residents.
- Comply with all of Barclay Friends policies and procedures as well as the laws and regulations that apply to their business or profession.
- Maintain all applicable licenses and certification and provide evidence of current workers compensation and liability insurance as applicable.
- Require that their staff members comply with the Barclay Friends Code of Conduct and the Compliance Program and related training as appropriate.

Marketing and Advertising

Barclay friends uses marketing and advertising activities to educate the public, increase awareness of our services and recruit new staff members. These materials and announcements, whether verbal, printed or electronic will present only truthful, informative, non-deceptive information.

Disciplinary Action

Barclay Friends will take disciplinary action against any staff member who fails to act in accordance with this Code of Conduct, the Compliance Program, supporting policies and procedures and applicable federal and state laws. Disciplinary action may be warranted in relation to violators of the Compliance Program and to those who fail to detect violations or who fail to respond appropriately to a violation, whatever their role in the organization. Disciplinary action will utilize Barclay Friends' standard disciplinary processes. The Chief Executive Officer, the Human Resources Manager and the Compliance Liaison in conjunction with the Compliance Officer is empowered to initiate the disciplinary action through the immediate supervisor and to monitor appropriate implementation of the disciplinary process.

Compliance Questions

The laws applicable to Barclay Friends' operations are numerous and complicated. When a staff member is not sure whether a particular activity or practice violates the law or the Compliance Program, the staff member should not "guess" as to the correct answer. Instead, the staff person should immediately seek guidance from his or her department supervisor or the Compliance Liaison. Staff members will not be penalized for asking compliance-related questions. Indeed, Barclay Friends is intent on maintaining a culture in which every team member is comfortable asking the questions necessary to ensure that he or she understands the duties imposed on him or her by this Code of Conduct, the Compliance Program and other applicable federal and state laws.

Conclusion

The Compliance Program is critical for Barclay Friends' continued success. You are crucial to ensuring the integrity of Barclay Friends. The Code of Conduct and the Compliance Program set standards for the legal, professional and ethical conduct of our business. Some key points to remember are:

- **Barclay Friends and all of its staff members are committed to personal and organizational integrity, to act in good faith, and to be accountable for their actions.**

- The Code of Conduct and the Compliance Program prepare us to deal with the growing complexity of ethical, professional and legal requirements of delivering healthcare and the CCRC environment.
- The Compliance Program is an ongoing initiative designed to foster a supportive work environment, provide standards for clinical and business conduct and offer education and training opportunities for staff members.

The success of the Barclay Compliance Program depends on our commitment to act with integrity, both personally and as an organization. As a staff member, your duty to Barclay Friends is to ensure that the organization is doing everything practical to comply with applicable laws. You are expected to satisfy this duty by performing your responsibilities in accordance with professional standards, regulations, and the policies and procedures of Barclay.

Barclay Friends Compliance Program and Code of Conduct

By signing below, I agree that I have received a copy of the Barclay Friends Code of Conduct.

Employee Signature

Date