

CARE Hawaii, Inc.

Corporate Code of Ethics

CARE Hawaii, Inc. provides a comprehensive array of behavioral health services to promote physical, emotional, social, spiritual, recreational, and educational development of all identified consumers and their families/significant others. In doing so, we must hold our employees to the highest ethical standards of the Company and their professions. The Company's Corporate Code of Ethics will outline acceptable behaviors for employees and will assist in the decision making when ethical dilemmas arise.

I. CODE OF ETHICS

- 1. Business** - The Company is a provider of behavioral health services that strives to be the first choice of those seeking professional help. To do so, we must employ quality employees dedicated to the performance of their duties in a highly ethical and moral fashion. To maintain our reputation as a Company of the highest standards of lawfulness, ethics, responsibility and accountability, all employees shall at all times: comply with all laws and the highest standards of business ethics and conduct in every state in which the Company conducts business; avoid situations which might involve a conflict between their personal interests and the interest of the Company, and those situations which create the appearance of conflict; and protect confidential and proprietary information held by the Company or entrusted to it.

The success of the Company as a provider of mental health services is built upon the trust and confidential relationships maintained between the Company and its clients, the communities we serve, government, and the general public. In turn, each individual employee builds on the success and continues the reputation of the company by placing the Company's interest above the employee's own self-interest. Employees have the responsibility to uphold this trust, acting with integrity and conforming to the highest principles of professional, ethical, and moral conduct.

- 2. Marketing** - The Company's marketing efforts are to accurately represent the services that are provided. It is the responsibility of the Program Director along with the CEO and COO to produce marketing materials for clients and other stakeholders. Marketing materials are to be factual and are not to discuss services provided by competitors. Employees are to only use approved marketing materials. Media inquiries regarding services provided are referred to the CEO.
- 3. Contractual Relationships** – The Company is able to provide services by executing contracts with third parties. The CEO or designee, on behalf of the President, is the only staff member authorized to execute a contractual agreement. Once there is a

legally binding agreement, the Company is required to adhere to the contract. All contracts will provide, at the minimum, the information listed below.

- a) Contracting Agency
- b) Contract Identification Number
- c) Name of Contract
- d) Scope of Services
- e) Time of Performance
- f) Payment Schedule
- g) General and Special Conditions, if applicable
- h) Notification Requirements

4. Conflicts of Interests - As a provider of behavioral health services, we expect higher standards of conduct to safeguard our trust and integrity. Employment with the Company must never be used directly or indirectly for private gain; to advance personal interest; or to obtain special benefits or treatment for the employee, their family, or any other person. A conflict of interest is generally defined as a business activity or relationship with another Company or individual that, in the Company's judgment, may result in questionable business ethics or compromise the employee's loyalty to the Company. Generally, no employee may directly or indirectly maintain outside business and/or financial interests or engage in any other outside business or financial activity that conflicts with the interests of the Company.

- Employees and members of their immediate families may not serve as directors or officers or have a substantial investment in a business competitor, or maintain a personal relationship with a competitor, client, supplier, or employee of any Company which results in a breach of the employee's duty of loyalty to the Company.
- Employees who have access to confidential information of another corporation may not buy or sell stock in that corporation.
- Employees and members of their immediate family may not solicit or accept from an outside vendor or source which does business with, seeks to do business with, or competes with the Company, any compensation, gift or discount of more than nominal value (normally \$25-\$100).
- Employees may not provide financial compensation for any reason to a client or another employee and may not accept financial compensation for any reason from a client or another employee.
- Employees may be employed by, or perform services for, any competitor or supplier of the Company if it does not interfere with the employees work schedule or duties. While simultaneously working for another employer, at no

time will it be permitted that the employee's conduct jeopardize the integrity of the Company or the consumer in any way.

- Supervisors are required to be available at any given time. Employees in this role are not permitted to be employed by any competitor or any supplier of the Company.
- Employees may not perform services that may cause embarrassment to or jeopardize the interests of the Company, interfere with its work schedules, or adversely affect its productivity or that of its employees.

- 5. Gifts, Money and Gratuities** - In order to maintain professional business relations with suppliers, vendors and others, the Company does not allow employees to accept gifts, gratuities, material considerations, or other things of more than nominal value from anyone doing business, or seeking to do business, with the Company. Any gifts received of more than nominal value must be reported to the employee's supervisor and returned to the giver with a note explaining the Company's policy. Gifts by any means may not be used to coerce, intimidate or bribe an individual whether the recipient is a co-worker or supervisor. Monetary gifts are highly discouraged. Gifts of candy, food items, or flowers may be accepted, but must be shared with other employees and may not be taken home. In addition, employees are not permitted to accept any form of gifts from any client.

There are occasions in which employees may want to celebrate by gift giving, this will be allowed. Gift giving is always voluntary and never made mandatory.

- 6. Personal Fundraising** – Solicitation and distribution for personal cause could interfere with business practices. At no time shall clients or business contacts sell items on behalf of employees nor shall they be solicited to purchase items from employees. Personnel shall not use Company bulletin boards for their personal use. All personal fundraising shall be done outside of business hours and separate from the business of CARE Hawaii, Inc. Personnel are not obligated to support the personal fundraising of any employee.
- 7. Personal Property** –The Company is not and will not be responsible for any personal property of employees. Personnel property shall not be stored on the Company's premises. Personal property of clients shall be safeguarded, if allowed to be stored, using the guidelines outlined in the departmental policies and procedures. Company property shall be used for business purposes only and shall not be used for personal use.

- 8. Setting Boundaries** – In upholding the mission and vision of the Company, it is the responsibility of all employees to remain professional at all times. Regardless of client status (current client or previous), employees are prohibited from engaging in relationships (business, personal or otherwise) that could result in personal gain for the employee and/or disadvantage for the client. Additionally, any activity that may violate any other policy or procedure, departmental or company-wide, is also prohibited. In the instance where a relationship between employee and client was preexistent, the employee may not be involved in any manner with the client’s case.
- 9. Witnessing of Documents** – Any employee directly involved in the care of the client may be a witness to the signing of documents, when deemed necessary. Employees should not have a financial gain or other interest in the client’s business. Employees are not to be a co-signor on a document, only a witness of the signing of the document by the client.
- 10. Professional Responsibilities** – All personnel are expected to uphold the Company’s Corporate Code of Ethics, and when applicable, the code of ethics specific to the employees profession or discipline. If there is a violation of the Company’s code and the professional code, the violation will be addressed by the Company, reported to the personnel’s professional association according to its reporting procedures and to the Regulated Industries Complaints Office, if applicable. Professional Codes of Ethics that applies to employees of the Company may include, but are not limited to:
- American Psychological Association – Ethical Principles of Psychologists and Code of Conduct
 - American Nurses Association – Code of Ethics for Nurses
 - American Association for Marriage and Family Therapy – Code of Ethics
 - National Association of Alcoholism and Drug Abuse Counselors
 - National Association of Social Workers
- 11. Human Resources** - In order to provide equal employment and advancement opportunities to all individuals, employment decisions at the Company will be based on merit, qualifications, and abilities. The Company does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex or gender, national origin, age, disability, ancestry, sexual orientation, arrest and court record except as provided by H.R.S. § 378-2.5, marital status, military service, veteran status, or any other characteristic protected by law. Any form of harassment or discrimination of any employee because of protected status is prohibited. The Company will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship.

12. Waste, Fraud, Abuse and Other Wrongdoings – The Company is committed to meeting applicable legal and ethical standards and will seek to embody the spirit of legal and ethical codes as well as delivery services in a cost-effective and outcome-effective manner.

- Financial audits will be performed externally on an annual basis.
- All accounting and billing practices are to be based on general principles and policies must be followed to insure accountability.
- Resources are to be preserved in order to have sufficient resources available to provide quality services.
- Delivery of services are to be verified through the review of billing and the verification of the client served
- Suspected cases of fraud, waste, abuse and other wrongdoings will not only be addressed by the Company but will be reported to the appropriate funding source and, if applicable, Adult Protected Services or Child Protective Services

II. ADMINISTRATION AND ENFORCEMENT

1. Reporting – If you have any concerns about the Corporate Code of Ethics, we encourage you to bring them to management’s attention without fear of retaliation. In accordance with Hawaii’s Whistleblowers’ Protection Act, Hawaii Revised Statutes §§ 378-61 *et. seq.*, the Company will not discharge, threaten, or discriminate against an employee regarding the employee’s compensation, terms, conditions, location or privileges of employment because an employee or a person acting on behalf of an employee: (1) reports or is about to report to the employer or a public body, verbally or in writing, a violation or suspected violation of a state or federal law, rule, ordinance or regulation or a contract executed by the state, a political subdivision of the state, or the United States, unless the employee knows that the report is false; or (2) is requested to participate in an investigation, hearing or inquiry by a public body, including a court. Employees must also avoid conduct on or off the job that may harm the Company’s reputation in the community, including but not limited to criminal conduct.

2. Procedures

- a) All staff will be trained upon hire and then annually regarding the Corporate Code of Ethics and Compliance Plan.
- b) A notice informing staff and consumers how to notify the Compliance Manager of any perceived violations will be posted at all sites, and will be advertised in the Employee Newsletter.
- c) Any alleged violation reported to the point of contact will be discussed with the CEO.
- d) All alleged violations and complaints will be investigated.
- e) Within 10 working days of receiving a complaint, the Compliance Manager conducts an inquiry to determine the facts of the complaint and to receive a response by the provider or staff that may be named in the complaint. This inquiry may include interviews with all parties as well as review of clinical records.
- f) The Compliance Manager will report the results of the investigation to the CEO and any action to be taken will be decided.
- g) If necessary, a written response to the complaint is to be provided to the complainant within 20 working days of receiving the original complaint. This response may include findings from the inquiry, if available.
- h) If the complainant is not satisfied with the written response, he/she may request a review by the CEO; within 10 working days of receiving the written response.

i) The CEO shall provide a final report within 30 working days of receiving the statement of dissatisfaction with the written response to the original complaint.

j) The Compliance Manager will maintain a record of the complaint and corresponding documents with the action taken.

III. TRAINING/EVALUATION

1. Personnel – Employees are trained on ethics upon hire, annually and as needed during the course of their employment. Annually, employees are surveyed on their understanding and satisfaction of the ethics and compliance plans.

2. Clients and Other Stakeholders – Information regarding ethics and the company's compliance plan is provided on the Company's website which is accessible by the public. Clients are informed of their rights during the admission process. Annually, clients and stakeholders are surveyed on their satisfaction with the implementation of the ethics and compliance plans.

IV. ADVOCACY EFFORTS AND CORPORATE CITIZENSHIP

1. Staff members, once approved, will participate in public community events, when available, in an effort to inform the community about the types of people served and the services that the Company provides. Advocacy efforts are documented by the participating staff member and given to the Compliance Manager to be filed.

2. It is the responsibility of all staff members to comply with the Corporate Code of Ethics; and if an issue of non-compliance arises, it shall be reported immediately.