



HEALTH FORCE'S CODE OF CONDUCT AND ETHICS

Health Force's Code of Conduct and Ethics (the "Code") is intended to be read in conjunction with and references Health Force's Policies and Procedures Manual. As such, both will be reviewed, updated, and approved on a regular basis by Health Force's governing body. The Code is both a training tool for all Health Force employees as well as the codification of the principles, values, and policies central to Health Force.

Who We Are: Health Force is a care management company with over 30 years of experience providing in-home health and hospice services. We provide dedicated and compassionate medical professionals to assist insurance companies, facilities, and care management organizations in keeping their members safe in the home without having to experience preventable emergency room visits or hospitalizations.

Mission: The mission of Health Force is to work collaboratively with health care providers to identify individuals at risk for hospitalization and/or Emergency Department visits due to their challenging medical and/or psychosocial needs. Site-based Case Managers, which include Nurses and Social Workers, provide these services through professional assessments and promotion of quality and cost-effective interventions to ensure optimal client wellness and autonomy.

These services shall be of the highest quality, provided by the most competent, ethical staff in a cost-effective manner.

Health Force is committed to ongoing performance improvement and will continually seek ways to meet the needs of our customers and community.

Core Values: Everything that we do derives from our four core values:

- 1. Integrity First:** We must always strive to do the right thing, every time, every chance we get.
- 2. Shared Success:** We are better together. Health Force is built upon collaboration and maximizing our individual talents from the CEO to the in-home assessor we must together do our part to ensure our continued success.
- 3. Compassionate Care:** We respect all people and value their life experiences, thoughts, and perspectives, especially the elderly. Our compassion should be present in all we do so they feel valued and appreciated.
- 4. Empowered Health:** Knowledge is power. By increasing members' awareness of their health (physical and mental) we are equipping them with the tools and state of mind to proactively manage their own wellbeing.

Commitment: Health Force is deeply committed to integrity in everything we do. Our integrity is reflected in how we consistently serve our clients and their members in the utmost ethical and responsible manner in accordance with our mission and core values. We strive to provide the highest quality of services in compliance with all applicable laws, regulations, and guidelines, as well as Health Force's policies and procedures. Health Force does not, and



will not, condone any activities or practices by any employee, stakeholder, or anyone acting on its behalf that violate the letter or the spirit of any applicable laws and regulations or our own internal high standards.

Scope of the Code: The Code applies to all Health Force employees, stakeholders, or anyone acting on behalf of the company with regards to any business function (transaction, activity, or service). Adherence to this Code is mandatory and it is how we ensure that Health Force remains true to its mission, its core values, and its ethical and legal obligations. No one, regardless of position, will be allowed to compromise adherence to the Code, laws, regulations, or any business standards.

Ten Integrity Principles of the Code:

Principle 1: Integrity of Care Elevates the Quality of Service

Principle 2: Integrity Demands Compliance with All Applicable Laws

Principle 3: Integrity Fosters a Healthy Working Environment

Principle 4: Integrity Necessitates Accurate and Truthful Billing and Records Keeping

Principle 5: Integrity Secures and Protects All Clients and Members' Information

Principle 6: Integrity Protects Health Force's Confidential Information and Assets

Principle 7: Act with Integrity when Addressing Potential Conflicts of Interests

Principle 8: Integrity Mandates Open and Constant Communication

Principle 9: Integrity Has Zero Tolerance for Fraud, Waste, and Abuse

Principle 10: Integrity Requires Sustained Commitment to Continuous Growth and Training

Failure to Comply: Failing to comply with the Code, or applicable laws and regulations can result in serious damage to Health Force's reputation and good will, namely our standing with our clients' and their members, business partners, and colleagues in the industry. Moreover, failure to comply with the Code could also lead to legal or regulatory action against the company or individual employees, as well as disciplinary action by Health Force including up to termination of employment.

Point of Contact: If you have any questions about the Code or about any policies or practices of Health Force, please raise the questions with your direct supervisor or the Compliance Officer, Henry A. Motes, who may be reached at CorporateCompliance@healthforceus.com. Our Compliance Officer is charged with being available and responsive to all employees or



anyone acting on behalf of the company when questions arise about adherence to the Code or any compliance-related concerns.

This version of the Code was adopted by Health Force on September 1, 2018 and is intended to ensure that Health Force fulfills its compliance goals in today's health care and business environment, as well as codify our core principles.



PRINCIPLE 1: INTEGRITY OF CARE ELEVATES THE QUALITY OF SERVICE

We are committed to providing high quality care and services to our clients and their members so that their members can remain safe, happy, and healthy in their homes.

Safety and Welfare: The success of our business is based on protecting and advocating for the members that we serve and their overall welfare. Given that the population we serve are elderly and disabled, we must be vigilant. We must make every effort to protect the health, safety, and welfare of our clients' members. This includes being aware of the signs and symptoms of the following:

- **Abuse** – e.g., physical, sexual, verbal, or emotional
- **Neglect** – e.g., conduct that could or does result in serious physical or emotional injury
- **Exploitation** – e.g., use of a position of trust to knowingly deceive or intimidate, or deprive of resources, funds, or assets

Cultural Competency Policy: Cultural considerations for all clients and their members shall be respected and observed whenever possible. Where such considerations impede the provision of care or treatment, personnel shall work with members and or their family in an effort to accommodate them. All interactions with any client or members must be done in a culturally competent and sensitive manner. This requires that all employees of Health Force be aware of the potential cultural differences and economic disparities in the population that we serve. You should also strive to be aware of your own cultural biases and how they influence your perspective.

Client/Member Nondiscrimination Policy: Health Force provides services to all and does not discriminate against any client or member of a client for any reason, including race, color, sex, sexual orientation, national origin, age, physical disability, mental illness, political beliefs, veteran status, or any other classification protected by law.

Prohibition Against Exclusion Listed Persons: Health Force screens all potential new employees or any person that will be acting on its behalf against the Office of Inspector General and General Services Administration exclusion lists. An individual appearing on either list is not eligible for hire or rehire. Records of screening activities are kept on file for 10 years.

Periodic Training Required: Pursuant to our goal of providing the highest quality of care, all employees are required to participate in regular job-specific training to ensure our compliance with industry benchmarks and expectations.

With this Principle in mind, you will:

- Act fairly and honestly with those who are affected by your actions, and respect and value those you serve by adhering to the golden rule and treating them the way you would want to be treated, i.e., with respect, compassion, and care
- Strive to provide the best level of care possible to our clients' members consistent with our belief that the best quality of care and services requires that all aspects of member care are to be taken seriously
- Respect the dignity of each member by responding to all member questions, concerns, and needs in a sensitive and timely manner



- Immediately call 911 or the local authorities, if you suspect a member is in danger or is being physically abused or neglected

See Health Force's policies and procedures on Client Care for more information.

PRINCIPLE 2: INTEGRITY DEMANDS COMPLIANCE WITH ALL APPLICABLE LAWS

We are committed to maintaining the highest ethical standards of business and professional integrity that complies with all applicable laws and regulations but more importantly our own high ethical standards including this Code.

The Highest Standards: The cornerstone of integrity is holding yourself to the highest standards. Health Force does not only observe and follow all applicable laws, but it holds itself and all its employees to the highest ethical standards. Our commitment to integrity requires that even where the law may be permissive or less defined, Health Force shall adopt and adhere to the strictest standard or interpretation of any law, regulation, or policy.

Nondiscrimination Employment Policy: As to employment with Health Force, we do not discriminate on the basis of race, color, sex, sexual orientation, national origin, age, physical disability, mental illness, political beliefs, veteran status, or any other classification protected by law.

Prohibition Against Bribes/Gifts Policy: Health Force does not authorize, offer, or provide or accept any bribes, kickbacks, rebates, or anything of value in order to gain an improper business advantage. Nominal, pre-approved, or seasonal gifts offered to clients and potential clients that do not exceed \$50 are excluded from this policy. All other gifts are prohibited. Employees of Health Force should not accept any gift of any kind from any client or any member of any client.

Prohibition Against Retaliation: Health Force will never retaliate or take any negative action against any employee, who in good faith reports a suspected violation of this Code or any other ethical concerns to Health Force.

With this Principle in mind, you will:

- Comply with the letter and spirit of all applicable laws.
- Update Health Force within ten (10) days of any adverse change in your licensure or certification status – failure to do so could lead to disciplinary action, including termination.
- Act in such a manner that the full disclosure of all facts related to any activity would reflect favorably on the company and you.
- Strive to ensure that complete and accurate member medical records are maintained in accordance with Federal and state privacy and security laws, regulations, and policies.
- Ensure that confidential member information is accessible only to health care personnel involved in the member's care, third party payers, and others authorized to review client information.



- Promptly report to Management, the Company Compliance Officer, or the Compliance Inbox whenever a possible violation of law, regulation, or policy has occurred.
- Attest and continue to attest that you are not listed on any exclusion lists, i.e., any persons that have been sanctioned by the Office of Inspector General (OIG) of the U.S. Department of Health and Human Services or the General Services Administration, e.g., excluded from participation in Federal health care programs, or barred from a state health care program, e.g. Medicaid.

See Health Force Policies and Procedures Manual, Section III Compliance.

PRINCIPLE 3: INTEGRITY FOSTERS A HEALTHY WORKING ENVIRONMENT

We recognize that our employees are our most valuable assets. We are committed to creating a working environment where employees are treated with respect, dignity, and fairness while being fully empowered to successfully complete their daily work obligations.

Prohibition Against Harassment/Violence: Health Force is a harassment free workplace. We do not tolerate verbal, physical, or sexual harassment or intimidation of any kind. Neither does Health Force tolerate any violence in any form. Such conduct is subject to immediate disciplinary action, including up to termination.

Your Opinion Matters: Health Force will maintain open lines of communication with all employees so that their views may be adequately considered and given their proper respect.

With this Principle in mind, you will:

- Show respect and consideration for one another, regardless of status or position
- Not manufacture, sale, possess, distribute, or use any illegal drugs or be under the influence of alcohol while working, including visiting with the members of our clients
- Comply with Federal, state, and local laws, regulations, and rules that promote the protection of health and safety
- Not harass, intimidate another individual while engaging in any conduct or activity on behalf of Health Force

PRINCIPLE 4: INTEGRITY NECESSITATES ACCURATE AND TRUTHFUL BILLING AND RECORDING

We shall promote the preparation and maintenance of timely and accurate client and member records, and billing for rendered services as documented in a member's medical records.



Accurate Documentation Required: In the healthcare industry if it was not documented—it did not happen. Going one step further, all documentation must be accurate. Accurate documentation should always be a top priority and is a direct reflection on Health Force. As such, Health Force will make every attempt to ensure that any claim submitted for payment is properly coded, documented, and billed in accordance with applicable laws, regulations, and third-party protocols. To this end, the company will promote the periodic review of bills, reimbursements, medical records, and services rendered to clients and their members to ensure accuracy in documentation.

Third Party Remediation Policy: In the event of an error involving a third party that requires remediation, Health Force will promptly disclose to the third-party payers any such error and timely refund any money received to which Health Force was not entitled.

Record Retention Policy: As part of our standard documentation retention policy, we keep all billing and coding documents for 10 years in their original unaltered format before destroying in accordance with our data protection policy. All records are stored in a secured, safeguarded storage to insure safety from potential fire and water damage and from loss or unauthorized use. Electronically stored information is kept on a secure password protected server with access limited to only relevant personnel.

With this Principle in mind, you will:

- Not intentionally submit, or cause to be submitted, for payment or reimbursement a claim that you know to be false, fraudulent, or fictitious.
- Timely and completely prepare and maintain all medical documentation or coding in a manner consistent with the highest integrity and any applicable laws and regulations.

PRINCIPLE 5: INTEGRITY SECURES AND PROTECTS CLIENTS AND MEMBERS' INFORMATION

We are committed to protecting the personal data and honoring the privacy of our clients and their members in compliance with all applicable laws

Health Force safeguards the use and disclosure of protected health information, including information related to treatment, medical history, current health status, payment for treatment and other information contained in member's records, in accordance with the Health Insurance Portability and Accountability Act (HIPAA) privacy and security regulations, state laws, and Health Force's policies and procedures. See Health Force's policy on HIPAA Compliance for more information.

Pre-Disclosure Authentication Requirement: Health Force requires authentication prior to disclosure of any protected health information. Authentication is a two-step



process validating both identity and authority are required. We must verify the identity of the individual for whom information is being requested. We must also verify the authority of any person to have access to the protected health information.

With this Principle in mind, you attest that at all times during your employment with Health Force, you will:

- Respect the property and possessions a member and not engage in any unauthorized use of their possessions
- Dispose of any duplicative or unneeded client or member information in your possession by shredding or destroying in a confidential manner and upon termination of your employment destroy all information relating to any clients or members within your possession in a similar manner
- Honor the privacy of our clients and their members and not reveal or discuss member-related information except with health care personnel involved in the member's care, payment of services, or other reasons directly related to care or payment.

PRINCIPLE 6: INTEGRITY PROTECTS AGENCY'S CONFIDENTIAL INFORMATION AND ASSETS

We are committed to protecting Health Force's property and information against loss, theft, destruction, and misuse.

Duty to Protect and Secure Health Force's Property: Health Force employees have access to its confidential business information such as but not limited to trade secrets, intellectual property information about Health Force's clients, terms of its contractual relationships with its clients, Health Force's personnel, its business practices and methods, its marketing plans, its business plans, and other financial information of Health Force such as pricing and costs information, and other confidential or proprietary information. As such, you have an affirmative duty to protect against damage, theft, misuse, or abuse of Health Force's confidential information as well as its property and assets.

No Vested Interest in Health Force's Property: You understand that anything issued to you by Health Force is the sole and exclusive property of Health Force. Your use of Health Force's property does not vest any ownership interest in the thing being used.

With this Principle in mind, you attest that at all times during your employment with Health Force, you will:

- Correctly use and care for all property and proprietary information entrusted to you
- Respect the property and possessions of members, colleagues, and clients and not engage in any unauthorized use



- Not communicate or transfer any information, property, or documents to any unauthorized persons or otherwise use any information, property, or documents acquired while an employee at Health Force for your or another's personal gain
- Promptly return Health Force's property upon termination of employment or be subject to legal action by Health Force for the full retail value of the property not returned
- Not solicit current clients, nor current employees of Health Force relating to your provision of any services similar to those provided by Health Force or provided by you during your time as an employee of Health Force
- Upon the termination of your employment with Health Force, destroy all personal health information or sensitive information pertaining to any members you served.

PRINCIPLE 7: ACT WITH INTEGRITY WHEN ADDRESSING POTENTIAL CONFLICTS OF INTERESTS

We are committed to acting in good faith in all aspects of our work. We must avoid conflicts of interest or the appearance of conflicts between the private interests of any employee and her or his work duties.

Assessing Potential Conflicts: A conflict of interest arises when one has a stake or vested interest in which regard for one's duty leads to potential or actual disregard for another duty. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or someone associated with that employee as a result of Health Force's business dealings or activities.

Duty to Disclose: To be clear, having a conflict of interest is not necessarily a violation of the Code. However, failing to disclose the conflict to your direct supervisor, the executive team, or the Compliance Officer is a violation. All employees are required to disclose potential conflicts of interest on an annual basis or sooner if your status changes. If you are unsure of whether a relationship is a potential conflict of interests, you should disclose it so that it can be properly evaluated. If an actual potential conflict of interest does exist, safeguards and protocols must be implemented to protect Health Force.

Possible Conflicts of Interest: Personal, familial or business relationships that could interfere with your ability to meet your obligations to Health Force and its clients, including but not limited to your involvement direct or indirectly with any entity that competes with Health Force, the solicitation of Health Force business partners or personnel, or the use of any proprietary information or property belong to Health Force for your personal gain.

All employees are required to certify on an annual basis that they have disclosed all potential conflicts of interest by completing, signing, and submitting Individual Statement Regarding Conflict of Interest.



With this Principle in mind, you will:

- Exercise good faith and fair dealings in all transactions that involve your responsibilities to Health Force
- Not engage in any activity, practice, or act that creates an actual or apparent conflict of interest with Health Force
- Devote your attention and activities solely to Health Force and its clients, and their members during your scheduled hours of work
- Disclose all potential conflicts of interest to your direct supervisor or the Chief Compliance Officer, failure to do so is subject to disciplinary action, including up to termination

PRINCIPLE 8: INTEGRITY MANDATES OPEN AND CONSTANT COMMUNICATION

We are committed to ensuring that every employees voice is valued and respected and that management is not only accessible but approachable.

Health Force fosters open communication at all levels of the company. If you have any compliance-related questions or concerns please reach out to the Compliance Officer, your direct supervisor, or any member of the executive team. We encourage you to speak up and report any business activity that you believe may violate any applicable laws or this Code.

Process for Reporting Violations: You may report concerns as follows:

Step 1: Discuss the question or concern with your direct supervisor. Your direct supervisor is most familiar with the laws, regulations, and policies that relate to your work.

Step 2: If you are not comfortable with talking to your supervisor or feel you did not receive an adequate response, contact your supervisor's manager or another member of the management team.

Step 3: Contact the Company Compliance Officer at corporatecompliance@healthforceus.com or via the Corporate Compliance hotline at 1.844.579.1500 ext. 720.

Step 4: The Compliance Officer will review and address all reports made to the Compliance Inbox.

Responsibility of Employees: All employees are expected to follow all laws, regulations, and Health Force's policies, including the Code. Anyone who knows about or suspects a violation must report this information. If an employee does not report a violation, he/she may be subject to disciplinary action even if not directly involved. Reporting does not protect an employee from disciplinary action regarding his/her own performance or conduct, but their honesty in reporting will be considered. If so asked, your full



participation and cooperation is expected in conducting any investigations into any report of wrongdoing.

Responsibility of Management: Management is expected to demonstrate a commitment to ethical and legal behavior that is consistent with Health Force’s mission and its Compliance Program. Management is responsible for maintaining an environment that stresses a commitment to compliance with the Code of Conduct and Ethics and with laws, regulations, and policies, as well as prohibits retaliation or reprisals against employees who report actual or suspected compliance violations. Management will also promptly investigate any report of wrongdoing made in good faith.

A supervisor or manager has an obligation to ensure that employees:

- Receive, read, and understand the Code of Conduct and Ethics;
- Understand their affirmative duty to report actual or suspected Code of Conduct and Ethics violations;
- Know about and follow all laws, regulations, and policies within the scope of their responsibilities;
- Know the procedures for reporting suspected or actual violations; and
- Encourage others to ask questions and to report actual or suspected violations.

If an employee comes to you with a question regarding compliance with a law, regulation, or policy, you are responsible for:

- Taking steps to ensure the employee does not fear or experience retaliation;
- Maintaining the employee’s confidentiality;
- Collecting accurate information regarding the employee’s report; and
- Pursuing the right process so that reports of violations or suspected violations can be further investigated; and informing the employee that you have followed through on his or her report.

PRINCIPLE 9: INTEGRITY HAS ZERO TOLERANCE FOR FRAUD, WASTE, AND ABUSE

We are committed to rooting out and eradicating any fraud, waste, or abuse within the company and taking swift and prompt action to prevent and deter such activity.

The detection, correction, and prevention of fraud, waste, and abuse (FWA) are essential to maintaining an honest and affordable health care system and our integrity as a health care management company. FWA is not only unethical, it is illegal. Under the Federal False Claims Act any individual or entity that knowingly submits a false or fraudulent claim for payment of United States Government funds can be held liable for significant penalties and fines. This act applies to claims by health care organizations to Medicaid, Medicare and other government



sponsored health care programs. Health care fraud is a focal point for state and federal regulators and law enforcement agencies.

Examples of fraud include:

- Falsifying information submitted on a claim or in a care plan
- Submitting false expense reports
- Misappropriating assets or misusing company property
- Forging or altering checks
- Improperly changing company records or financial statement

Duty to Report FWA: Everyone who performs a business function or service for Health Force has an affirmative duty to report suspected FWA to either your direct supervisor, the executive management team, or the Compliance Officer.

Prompt Investigations: We will immediately investigate all suspected fraud, waste, and abuse charges and, where warranted, take appropriate disciplinary action and, if needed, fully cooperate with law enforcement in the pursuit of criminal charges.

If you suspect any FWA, please inform your direct supervisor or contact the Compliance Officer at CorporateCompliance@healthforceus.com.

Disciplinary Action Plan: Health Force will promptly take appropriate disciplinary actions for employees deemed to be in violation of the Code and its supporting policies or any applicable laws and regulations. Any such violation could compromise Health Force's integrity and reputation and result in criminal or monetary penalties or disciplinary action. This disciplinary action may include, but is not limited to, a verbal warning, a written warning placed in your HR file, ineligibility for any bonus incentives, reduced workload, issuance of other corrective measures, mandatory training, or termination of your employment, and based on the violation potential reporting of your activity to the local authorities.

Examples of conduct that may result in some form of disciplinary action include:

- Authorization or participation in actions that violate the Code or any applicable federal, state, or local laws
- Failure to report any such suspected violation
- Refusal to report any such suspected violation
- Refusal to cooperate in an investigation of any such alleged violation
- Intimidating or retaliating against anyone for reporting in good faith a perceived violation or participating in an investigation into any such violation
- Intentionally making a false accusation, claim or report
- Misappropriating company resources for your personal gain
- Intimidation or harassment of any individual while conducting a business function or service on behalf of Health Force



PRINCIPLE 10: INTEGRITY REQUIRES SUSTAINED COMMITMENT TO CONTINUOUS GROWTH AND TRAINING

We are committed to ensuring that all employees are and feel that they are adequately trained and supported as they endeavor to fulfill their professional obligations to Health Force and comply with the Code and all applicable laws.

There is always room for improvement, such as a chance to learn something new, how to be more efficient or effective within your specific job function. Health Force is committed to ensuring that all of its employees receive regular and adequate job training not only relating to compliance with applicable laws, but also job-specific training for certain roles within Health Force.

Indeed, Health Force requires that all employees regularly participate in various compliance-related trainings addressing fraud, waste, and abuse and where applicable Medicaid-related subject matter. This education and training is tracked and monitored by Health Force's Department of Human Resources for compliance with all applicable laws. Newly hired employees undergo initial onboarding training by contracted health providers within 90 days of being hired and receive annual continuous learning and education training going forward.

Training records, including training calendars, for employees are stored by HR in their respective personnel files.

With this Principle in mind, you will:

- Timely complete all required trainings relating to your specific job function
- Notify and inform HR personnel of any addition continuing education that you participate in relating to any relevant licenses or certifications
- Work with Health Force to identify any additional trainings that may be needed to assist you in fulfilling your job responsibilities



CERTIFICATION AND ACKNOWLEDGMENT

I, _____, acknowledge that I have received and have read Health Force’s *Code of Conduct and Ethics*. I understand that the *Code of Conduct and Ethics* applies to my employment with Health Force and that following all laws, regulations, policies, and the *Code of Conduct and Ethics* are mandatory conditions of my employment. I acknowledge that I am aware of whom to contact if I have any questions about this Code and will seek advice from Health Force’s supervisors, its executive team, or the Compliance Officer if I have any such compliance questions or concerns.

Please return this signed form to the Human Resources Department

Employee Signature

Date