



Lakeview Center | FamiliesFirst Network | Global Connections to Employment

# Code of Business Ethics and Conduct

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## Message from Compliance Officer

Dear Team Member:

We are a unique organization focused on our mission of helping people. Our Mission and Vision link us together by creating a culture of support and belonging with our Values as the guideposts.

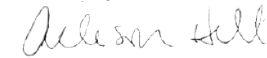
Many times, people can guess where we work by observing our professional conduct. Our team members are often presented with unpredictable challenges, but we always strive to do the right thing, even when no one is watching. We always want to ensure people connect to us and trust us. All of that depends on our decisions, word choices and interactions.

At LifeView Group, our mission is simple: helping people. Our vision is to be the trusted partner that others can rely on, and we are driven by our core values—treat people right, take care of each other, and never settle.

We interact with those we serve on a very personal level trying to help people along their life journeys.

We are the keepers of our culture. It doesn't just happen. It's up to each one of us to hold ourselves and each other accountable. The Code of Conduct outlined in this booklet, provides clarity around the basic principles followed by team members, leadership and even our board of directors. It is a testament to our commitment to be ethical and compliant in all interactions.

Sincerely,



Allison Hill  
President and CEO  
LifeView Group



Allison Hill  
President and chief executive officer  
LifeView Group

## Our culture



### About us

LifeView Group is a non-profit organization comprised of three unique service areas that help us fulfill our Mission of helping people throughout life's journey.



**Lakeview Center** serves adults and children with mental illnesses, drug and alcohol dependencies and intellectual disabilities. With multiple programs across Northwest Florida, our services range from residential treatment to outpatient counseling, psychiatry, trauma care, treatments for substance misuse and 24/7 support for those with serious mental illnesses. We adhere to a Trauma-Informed Care approach in everything we do.



**FamiliesFirst Network** provides child welfare, foster care and adoption services in Escambia, Santa Rosa, Okaloosa and Walton counties. Our specialized team is passionate about helping abused and neglected children and their families.



**Global Connections to Employment** is a nationwide team providing jobs for people with significant disabilities, including our war-wounded veterans. We empower our team members and help match them to fulfilling careers, from custodial services to facilities maintenance and food services, plus other business lines in between. Working with customers from the U.S. military, commercial business and community partners – as well as federal, state and local governments – GCE is one of the country's largest private employers of persons with disabilities.

Our **Values** are vital to our culture, serving as an overarching guide to our actions and behaviors. Our Values were carefully developed by team members to best represent who we are. Our Values help us advance our Mission of helping people and match our Vision, which is "to be the trusted partner."



## Our Values

### Treat people right

- Follow the Golden Rule - "Treat others as you would like to be treated."
- Be transparent, kind and fair.

### Take care of each other

- Behave like family – the family you trust and choose to spend time with.
- Be inclusive, open-minded and a team-player.

### Never settle

- Go the extra mile, and constantly pursue "better."
- Be persistent, relentless and encouraging.

## Our Vision

Be the trusted partner

## Our Mission

Helping people

# Focusing on diversity and inclusion

LifeView Group is committed to a diverse, inclusive and equitable workplace in which team members – regardless of their gender, race, ethnicity, national origin, age, sexual orientation or identity, education, military or veteran status or disability – feel valued and respected.



## What does this mean?

- We treat each other with dignity and respect.
- We have a culture of open and candid communication.
- We do not discriminate.
- We ensure our team members have opportunities to grow, contribute and develop.
- We acknowledge and fix any inequities within our policies, systems, programs and services, and continually update and report on our organization's progress.
- We lead with respect and tolerance, and we cultivate a culture that encourages collaboration, flexibility and fairness to enable individuals to contribute to their full potentials, feeling valued and supported.
- We are courageous and speak up when we observe actions and behaviors not consistent with our values.
- We comply with all applicable labor and employment laws.
- We make progress toward the visibility of our diversity, inclusion and equity efforts.
- We admit clients to service programs without regard to race, sex, religion, color, national origin, age, disability, marital status or any other inappropriate criteria.
- We ensure – to the extent possible – that diversity requests of clients are met including interpreter and translation services, religious accommodation requests and physical needs requests.

LifeView Group has a Diversity, Inclusion and Belonging team that drives initiatives in our organization. This team provides resources, training and surveys to support and encourage diversity initiatives. For more information, visit the Diversity, Inclusion and Belonging page on our intranet.

## Employee Resource Groups

LifeView Group has numerous resource groups in which team members can participate:

- Generations at Work
  - Individuals with Great Abilities
- Veterans Employee Resource Group
  - Remote Team Networking Group
- Book and Film Group
  - Caregiver Group
- Where the Heart is - Spiritual Group

# About the code

## How can the Code help you?

This Code of Business Ethics and Conduct (known hereafter as "the Code") is designed to provide basic information that will help guide you in maintaining ethical standards of conduct. The Code enables you to:

- Conduct yourself honestly and ethically
- Uphold our values and protect our reputation
- Understand what LifeView Group expects from you
- Comply with laws, regulation and standards
- Understand where to go for assistance or guidance if you have questions

Each section of the Code will provide team members information on:

### How we do what's right

The Code summarizes our approach to doing business.

### Why it matters

The Code explains why our actions matter and how our behaviors helps us uphold our culture and our Code of Conduct.

### What it means

The Code provides practical ways to avoid unwanted risks and helps us make ethical decisions that enable us to follow state, federal and other regulations.

Note: Access to specific policies mentioned in the Code is available in our Corporate Policy Manual.

## Who does it apply to?

Our Code applies to everyone in our organization, at every level, including

all divisions, team members, interns, volunteers, leaders and board members. We expect our business partners (third parties) to act in a way consistent with the principles and values of our Code when conducting business with LifeView Group. A third party is anyone who does business with LifeView Group, including:

- Vendors/suppliers
- Consultants
- Contractors
- Subcontractors

## What happens if we violate the Code?

Everyone this code applies to has an obligation to do the right thing the first time, every time. We take violations of the Code seriously and will investigate and appropriately address any substantiated violations. We will follow our Performance and Behavior policy to address corrective action needed.

It is the responsibility of every team member to completely read the Code of Conduct and ask questions about anything he or she doesn't understand. Team members can talk to their leaders or contact the LifeView Group Risk and Compliance Department for assistance.

### Code of Conduct disclaimers

This Code of Conduct:

- Supersedes any previous code of conduct or unwritten policies
- Does not create a contract, express or implied, and does not alter the "at-will" relationship between employers and employee
- Is not all-inclusive
- Does not guarantee employment for any definite period of time
- Does not supersede any federal or state laws
- Can be changed by the organization at any time
- Can be found on the LifeView Group intranet

LifeView Group maintains operations in several states throughout the nation. We recognize some employment-related laws vary from state-to-state and additional policies may be needed. We will follow and observe the laws of the state where you work, and those laws will control the policies in this Code of Conduct.

# Our responsibilities

## How we do what's right

We will follow all rules, policies, laws and regulations.

## Why it matters

Our Code of Conduct describes how to make decisions that support our Values. Because value-based decisions are so critical, these standards are a condition of employment for everyone. They ensure we make decisions in the best interest of those we serve, our communities, our colleagues and the organization.

## What it means

Every LifeView Group team member has an obligation to do the right thing – the first time and every time. We are all responsible for ensuring the Code is followed, which involves:

- Reading the Code of Conduct and asking questions if you don't understand
- Understanding policies and procedures
- Obeying all laws and regulations
- Using good judgement in making decisions
- Acting with honesty and integrity
- Modeling values
- Completing required training

## In addition to the responsibilities above, leaders are expected to lead in a way that demonstrates ethical leadership, which can include:

- Communicating the importance of the Code.
- Creating and maintain an environment where team members feel confident to report concerns.
- Providing opportunities for team members to attend training.
- Identifying and respond to ethical concerns.
- Never retaliating against team members for raising concerns.

## Making good decisions

Team members are expected to use good judgement and common sense when making decisions. Generally, if an issue is not covered in the Code of Conduct, team members should ask themselves:



### If you answer:

Yes	Move forward with your decision.
Not sure	Ask your supervisor, or contact the Risk and Compliance Department.
No	Don't do it!

If you hear the comments below, take a step back and ask yourself the questions above about making good decisions:

*"Don't worry about it. Everyone does it."*

*"That's how we do things here."*

*"Nobody is going to know."*

Everyone is expected to abide by the Code of Conduct. Failure to do so will result in corrective action up to and including separation of employment. In some cases, further legal action could be taken.

## Following legal and ethical hiring standards

LifeView Group is committed to ensuring our workforce maintains all required credentials, licenses and certifications.

We will not:

- Hire, contract with or bill for services by persons or entities that are excluded or are pending exclusion from participating in the federal and state health care and Medicaid programs or otherwise ineligible to participate in federal programs by the Office of Inspector General or Government Services Administration.
- Hire a government official, government consultant or source selection board member involved in any contract procurement activity – past or present – without going through appropriate procedures as dictated by the government.
- Allow caregivers or service providers with lapsed or revoked credentials to provide care to those we serve.
- Outsource contract labor to persons who are not authorized to be present at a place of work



We are proud to employ foreign nationals who are legally permitted to be employed and who add to LifeView Group's diverse workforce. We also abide by all laws governing the employment of foreign nationals who are not authorized to work in the United States (i.e. illegal immigrants).

We will not employ any person who is not properly authorized or legally entitled to be present at the place of work. We will not employ any person who is not permitted to perform required work activities because of lack of security clearance, failure to meet criteria specified by a contract, or other lawful reason.

## Speaking up

### How we do what's right

We speak up when we feel something is not right or we have other concerns. We hold ourselves accountable.

### Why it matters

We believe in open communication in an environment of trust and mutual respect that demonstrates our Mission, Vision and Values. This ensures our team members' voices are heard when they have concerns or feel something is not right. Speaking up also helps the organization uphold all policies, procedures, laws and regulations.

### What it means

Team members should feel comfortable going to their supervisors and Team Member Relations to provide feedback or to report concerns.

## Let your voice be heard

LifeView Group provides team members with opportunities to share feedback and concerns. Below are a few examples:

- Team member engagement survey
- Safety survey
- Diversity survey
- Team member self-evaluation form on evaluation
- Team member forums
- Employee Resource Groups

### Non-retaliation policy

LifeView Group will not tolerate retaliation against any team member who reports concerns in good faith. However, if LifeView Group determines that the complaint or report was not bona fide or was not made in good faith, or that a team member has provided false information regarding the complaint, corrective action may be taken. Every leader is responsible for ensuring that team members do not experience retaliation for having raised a concern.

Note: Results from surveys are available to team members on our intranet.

## Speak up: Report concerns

We have a responsibility to report concerns if something does not look or feel right or if we feel that someone is engaging in improper activities that violate the Code of Conduct, as well as other policies, rules or regulations. Team members can report concerns to the following:

- Manager
- Human Resources/Team Member Relations
- Risk and Compliance Department
- Compliance hotline/Compliance Officer

### Compliance hotline

Operated by an independent third party  
1-844-680-0573  
[LifeViewGroup.ethicspoint.com](http://LifeViewGroup.ethicspoint.com)



Team members can make anonymous reports using this hotline.

Examples of things to report:  
Falsification, billing concerns, misuse of company resource/information, accounting issues, conflicts of interest or other ethical violations.

## Doing the right thing

### Preventing harassment and discrimination

#### How we do what's right

We provide an environment that models our Values and is free of harassment and discrimination.

#### Why it matters

LifeView Group strives to provide team members with a positive work environment based on trust and mutual respect. In keeping with our commitment to equal employment opportunities, we will not permit harassment or discrimination against team members or applicants. LifeView Group policy prohibits not only sexual harassment, but also any form of harassment including but not limited to race, color, creed, religion, sex, national origin, gender, gender identity, age, ancestry, genetic information, military, veteran status, protected veteran, political affiliation, sexual orientation, protected veteran, marital status, disability – including physical or mental (examples: HIV and AIDS, cancer and genetic disabilities) – or other protected class recognized under applicable federal, state, or local law, ordinance or regulation.

#### What it means

- LifeView Group will not tolerate discrimination or harassment.
- We do not allow discrimination on the basis of protected personal characteristics with respect to employment practices or providing services to our clients or customers.
- We treat others with dignity and respect, and we model our Values.

- We think about how our actions and comments might be perceived or misunderstood by others.
- We do not tolerate any form of abuse or harassment of co-workers, clients, customers or business associates.
- We take harassment claims seriously and will investigate them.
- If discrimination or harassment has occurred, we will take steps to stop the behavior and will take corrective action up to and including separation of employment.
- We will not retaliate against anyone who reports discrimination or harassment in good faith

### Examples of inappropriate behavior:

- Disparaging comments, slurs, gestures or jokes
- Threatening, intimidating or hostile acts
- Put downs or inappropriate jokes that make people feel uncomfortable
- Making unwanted comments on dress, body parts and appearance
- Displaying offensive calendars, posters, magazines, office signs and clothing that are sexually suggestive or show hostility
- Inappropriate and repeated request for dates
- Making any unwelcomed, unwanted physical contact, including purposely invading someone's personal space

### Sexual harassment

One form of harassment is sexual harassment, which can occur when actions of a sexual nature that are unwelcome are made a condition of employment or are used as the basis for employment decisions.

An intimidating, offensive or hostile work environment may be created by unwelcome sexual advances, insulting jokes or other offensive verbal or physical behaviors of a sexual nature.

Team members should follow LifeView Group's policy for reporting concerns if they feel harassed or if discrimination has occurred.

## Preventing conflict of interest

**How** we do what's right

We operate with the highest degree of legal, moral and ethical standards by avoiding actual conflicts, as well as the appearance of conflict of interest. We work in the best interest of LifeView Group.

**Why** it matters

In our work, we have a duty to put the interests of the organization before our own. We avoid conflicts of interest, as well as anything even resembling a conflict of interest. No one should question whether we are acting for LifeView Group's benefit or for our personal gain.

**What** it means

- A conflict of interest can happen when you have a competing interest that may interfere with your ability to make an objective decision for the organization.
- We never offer or accept anything of value in exchange for referrals or other business.
- We cannot conduct non-LifeView Group business during their work time.
- We will not utilize company assets – including email, voice mail, fax, computers, copiers or other equipment or resources – to work an outside business.
- We will obtain approval from the Risk and Compliance Department before seeking any full- or part-time employment with an organization outside of LifeView Group.
- Team members will not participate or influence the selection of a business partner/vendor if the firm employs someone with whom you have a financial relationship, close personal or familial relationship.

## Is it a conflict? Ask yourself:

Am I using LifeView Group resources, relationships or my position for personal gain?



Does it compete with LifeView Group's interests?



Could it appear to be a conflict of interest to someone else?



Does it interfere with the work I do for LifeView Group?

If you answered "yes" to any of these questions, you should:

- Stop
- Report the issue to your leader or the Risk and Compliance Office
- Ask for guidance

## Avoiding conflicts

This Code does not list all situations that can present a conflict. Below are a few examples:

Personal relationships - supervising a friend, family member or someone with whom you have a romantic relationship.

Family members - allowing a member of your family to receive improper personal benefits as a result of your position with the organization.

Outside activities - allowing a second job or service to take away time and resources or conflict with your responsibilities to the organization.

Financial interest - investing in a company that does business with or competes with our organization.  
Business opportunities - taking an opportunity you learned about through work with our organization and using it for yourself or starting a business that competes with our organization.

## Gifts and entertainment

Team members will not offer or accept anything of value in exchange for referrals or other business.

What does anything of value mean?

- Money
- Services
- Gifts
- Entertainment

Note: A team member entertaining, or being entertained by, current or potential business partners must always have a legitimate business purpose.

## What is allowed?

### Acceptable

- Gifts of minimum value given during holiday season or other special occasions, which represent expressions of appreciation
- Reasonable entertainment at lunch, dinner or business meetings with customers and suppliers
- Awards for meritorious contributions or service if they have minimal dollar value
- Complementary admission to a conference will not be considered a gift if the team member has a business purpose in attending the conference.

Note: the acceptable items above are not allowed with government employees.

### Not acceptable

- Entertainment activities that compromise the business judgement, impartiality or loyalty of team members or business partners
- Entertainment activities at which the business partner is not in attendance, or for which there is no business purpose, is considered a "gift" and must be of minimal value.

## Appropriate interaction with government employees:

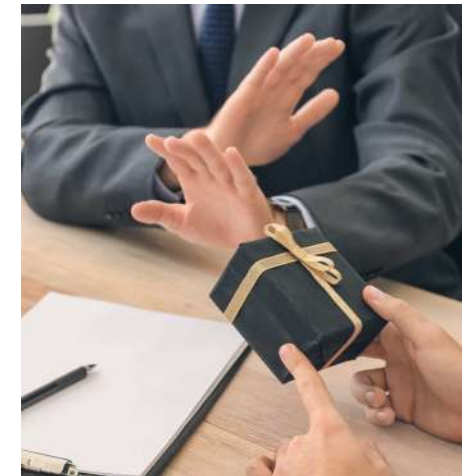
- Team members will comply with all applicable laws and regulations regarding appropriate interactions and when conducting business with government employees.
- Unless team members have specific prior approval by the compliance officer, team members are prohibited from offering any gifts, gratuities or entertainment for the personal use of employees, elected officials or officials of any government agency that LifeView Group is lobbying, selling or seeking to sell goods or services.

Note: The only exception is company-sanctioned gifts of a token nature with company logo – such as coffee mugs, pens, awards, plaques, certificates and bags – unless otherwise prohibited.

## Disclosing and resolving conflicts

In addition to annual disclosures for some positions, if you find yourself in a potential conflict of interest situation, talk with your leader or the Risk and Compliance

Department. Depending on the circumstances, some conflicts may be resolved if they are proactively disclosed and handled properly.



For additional information, please refer to the Conflict of Interest policy.

## Preventing fraternization

**How** we do what's right  
LifeView Group operates in accordance with the highest degree of legal, moral, and ethical standards when interacting with co-workers, person(s) served and customers.

**Why** it matters

Our person(s) served and customers depend on us to protect them from physical and emotional harm while providing services.

**What** it means

- Not accepting gifts from person(s) served.
- Team members who are closely related will not work together where there will be either a direct or indirect supervisor/subordinate relationship between them.
- Not counseling someone who is family, who you are friends with, or have a business relationship with, outside of therapy.
- Not assuming power of attorney over a current or former person(s) served or establishing any sort of fiduciary relationship with any current or former person(s) served outside of the clinical relationship.
- Keeping work contact numbers separate from your personal contact numbers. Do not provide clients your personal telephone number.
- Not taking advantage of any information gained about any person(s) served or persons related to a person(s) served.
- Refraining from business associations or dual relationships with person(s) served. (e.g. renting or selling property, hiring for personal business, etc.)
- Team members must not socialize, date, touch, kiss, have sexual contact, or have business associations with current or former LifeView Group persons served if they provided direct care and services.



## Interactions with person(s) served outside of work

Team members should only have off-work contact with a person(s) served which is deemed to be therapeutic in nature or an appropriate outgrowth of the treatment process.

- Only if that team member has prior written consent for such contact from his or her clinical supervisor and is in alignment with the guidelines set forth in the Fraternization policy.
- Programs sponsored and promoted by LifeView Group – such as CHIPS, where LifeView Group team members are encouraged to participate in the therapeutic foster home program – are permitted.

### Peer support and fraternization

Peer support team members at Lakeview Center should follow all guidelines mentioned in this section. With regards to interaction with clients, interaction outside of work is allowed but should be appropriate and not detrimental to the client.

## Preventing fraud, waste, abuse and corruption

**How** we do what's right  
LifeView Group operates in accordance with all applicable laws and regulations and with the highest degree of legal, moral and ethical standards.

**Why** it matters

We engage in fair and ethical business practices. Fraud and corruption leads to mistrust and harms not only our organization and its reputation, but also the clients, customers and communities we serve.

**What** it means

- We will not lie, cheat, mislead, steal or mistreat anyone while working with LifeView Group.
- We comply with all antitrust laws and never make agreements with competitors that create monopolies or stifle competition.
- We follow billing requirements required by law and contracts.
- We timely identify and refund over-payments from government sources and contracts.
- Our financial records conform to generally accepted accounting principles, and we never attempt to hide expenditures, funds, assets or liabilities.
- We hold our vendors and third parties accountable.
- We will only bill for services or goods as allowed by law and contracts.

## We prevent fraud, waste, abuse and corruption.

- We do not illegally obtain or use proprietary information from competitors, nor do we use deceptive means to gain such information.
- We never offer, promise or give anything of value to a government official or anyone else to gain a business advantage.
- We never offer or accept bribes or kickbacks.
- We follow the LifeView Group Conflict of Interest policy with regard to gift-giving.
- We don't compensate anyone based on referrals or business opportunities.

- We do not engage in conversations with competitors concerning pricing of an upcoming bid or negotiation.
- We will not solicit, obtain or use procurement-sensitive, confidential or proprietary information from the government, other customers or competitors.

### Examples of fraud

- Billing for services you did not provide
- Documenting that you provided services you did not provide (i.e. observation rounds, home visits, medication, contracted services, etc.)
- Billing for items and services that a client/customer no longer needs
- Billing more than once for a service
- Documenting that you provided one service when you provided another in order to bill more

## We provide accurate information.

- We require all statements, communication, records and representations be accurate, factual, complete and truthful.
- We appropriately and accurately record services and goods in records
- We do not backdate documents or make up entries.
- We do not sign other people's names.
- Our agreements are in writing and approved by a vice president.
- We ensure all payments made under a contract are for the services actually provided and at rates set forth in the agreement.
- We will perform only the services specified in our contracts and will not make changes to our contracts without written approval.
- We take every reasonable precaution to ensure that our billing and coding work is accurate, timely and in compliance with our policies, as well as federal and state laws and regulations.
- We will submit claims only for goods and services rendered and only for correct amounts as permitted by contract.
- We will not tolerate the submission of any claims that contain any kind of false, fraudulent or intentionally inaccurate statements.
- Our external reports are timely filed and contain accurate information.



## Red flags when working with third parties

- Poor records keeping
- Refusal to agree or adhere to our Code of Conduct
- Not following laws and regulations
- Third party related to a government employee
- Nonspecific description for payments made in accounting entries
- Over-invoicing or false invoices
- Refusing to certify compliance with requirements
- Unnecessary or excessive purchasing
- Employee insistence on using certain vendor

Note: The Federal False Claims Act and Deficit Reduction Act protect government programs – including Medicare, Medicaid, TRICARE and AbilityOne and all federal service contracts – from fraud and abuse. LifeView Group complies with these and all applicable laws. We have policies to detect, report and prevent waste, fraud and abuse, as well as provide protection for whistleblowers. If you see a false claim or report, fix it before it is submitted. If it has already been submitted, contact your leader or a member of the Risk and Compliance Department.

## Preventing human trafficking

Human trafficking affects individuals, families and communities. It occurs in cities, suburbs and rural areas. Individuals who have been trafficked can be any sex, race, age and nationality.

Trafficking involves force, lies or threats to make victims:

- Work against their will, often for little or no pay (labor trafficking)
- Have sex for anything of value such as money, food, shelter, clothes or drugs (sex trafficking)

A person younger than 18 who engages in a commercial sex act is a victim of sex trafficking – regardless of force, lies or threats.

## Potential signs of human trafficking

- Victims may be:
- Accompanied by a controlling person
- Unable to speak freely or share information
- Sharing a scripted or inconsistent history
- Showing signs of abuse or malnourishment
- Wearing clothes that are inappropriate for the season
- Not in control of their own money, identification or other personal possessions
- Unaware of their current location, date or time
- Unable to leave home or a job
- In need of food, shelter or clothing

LifeView Group strictly prohibits any form of human trafficking. If you suspect that a team member or client may be a victim of human trafficking, please call the National Hotline at 1-888-373-7888 or reach out to your leader or the Risk and Compliance department.



## Integrity when working with state and federal governments

### How we do what's right

We adhere to the highest ethical standards in all dealings with any federal, state or other government agency.

### Why it matters

LifeView Group is committed to being a responsible partner in business with the federal government, government agencies, and state or local governments in a manner that is fully compliant with all applicable laws and regulations.

### What it means

- LifeView Group will comply with all rules and regulations regarding the procurement process.
- Contact with government officials must never be conducted in a way that would be in violation of applicable laws and regulations or could cast doubt on LifeView Group's integrity.
- We will comply with the False Statement Accountability Act and be truthful in oral or written statements to government agencies and their employees.
- We will submit complete, timely and accurate information.
- We will follow laws and guidelines regarding gifts to government officials as stated in this Code.
- We will not make contributions or payments to political parties or candidates, nor will management directly or indirectly suggest that team member contribute to any particular party or candidate.
- Employees may not endorse candidates on behalf of LifeView Group. Employees are free to express their political views and support candidates of their choice when not on company time.



Responding to government inquiries: LifeView Group cooperates with government inquiries. In the event of an investigation by a federal or state agency, team members will:

- Forward all requests to the Risk and Compliance office to ensure a response
- Cooperate fully when interviewed
- Provide truthful, complete and accurate information
- Know that we prohibit retaliation for reporting misconduct or safety concerns in good faith
- Not alter or destroy records if we are aware of an existing or potential government inquiry

Note: LifeView Group will follow all applicable laws and regulations regarding reporting obligations. LifeView Group's Compliance Officer and Risk and Compliance Department will determine whether a particular breach of the Code involves issues that require a reporting obligation to law enforcement, a government agency, Office of Inspector General, the AbilityOne Commission, a contracting officer or any other third party. This does not prohibit team members from reporting concerns.

# Safeguarding our people and systems

## Safety in the workplace

**How** we do what's right

We follow health and safety policies and regulations that apply to our work and the guidance provided by the facility safety management team.

**Why** it matters

LifeView Group is committed to providing a safe environment for our team members, clients, customers and visitors.

**What** it means

- Making responsible choices and not allowing, directing or ignoring unsafe acts on the job
- Knowing and complying with occupational health and safety laws and related company policies
- Watching out for each other and helping others avoid unsafe conditions or behaviors
- Obeying all safe driving procedures, traffic laws and regulations while operating LifeView Group automobiles or any other vehicles while on company time
- Never being under the influence of alcohol, marijuana or illegal drugs on company property or during work time
- Only accessing hazardous materials and handling prescription drugs, controlled substances and other materials as authorized
- Abiding by a location's safety policy and procedures (e.g. rules on carrying weapons, cellular use and other similar rules for military bases, courtrooms and schools) when visiting external locations to conduct company business
- Following policies and procedures regarding safe home and community visits

## Workplace violence

We do not tolerate conduct that disrupts our work environment, including behavior that is disrespectful, hostile, violent, intimidating, threatening or harassing.

### Examples of prohibited behaviors:

- Causing physical injury to someone
- Making threatening remarks
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress
- Intentionally damaging employer property or property of another team member

\*This is not an all-inclusive list.

We will not enter a LifeView Group facility with any contraband substance or device that could potentially be used to cause harm (i.e. knives, firearms, explosives or other contraband as defined in our policy).

### We keep our workplace SAFE

**S**ay something if we see something is unsafe.

**A**ct in a proactive way to find solutions to make our workplace safer.

**F**ollow the laws, safety procedures, our Code and our policies.

**E**nsure everyone on our team is properly trained to perform their job.

## Safety first

Report any unsafe conditions or workplace injuries to your leader or to our Workers' Compensation and Safety Department. For GCE team members, in addition, please notify GCE's safety professional.

LifeView Group will not retaliate against anyone who reports a health or safety concern or participates in an external or internal investigation of these concerns.

## Protecting confidentiality

**How** we do what's right

We follow all applicable laws, regulations and policies. We take confidentiality seriously.

**Why** it matters

Those we serve trust that we will protect the information provided to us, including their health and personal information.

**What** it means

We protect our clients, customers and our team member's confidential information in the following ways:

- We follow all applicable privacy and data security laws and company privacy and security policies.
- We collect, use and process personal and confidential data only as needed for legitimate business purposes.
- We never share confidential information with anyone who does not have a business need to know.
- We do not look up information about our friends, family, co-workers or ourselves.
- We follow the release of information policy when releasing confidential information.
- We take steps to prevent identity theft by protecting personal data and securing our systems from unauthorized access.
- We protect our passwords and do not share them with anyone.
- We do not post protected health information or photographs of our clients on a website, social media page or public forum unless a proper release and consent is signed by the client.
- We do not use our personal devices to text or email protected health information for any reason unless otherwise allowed by policy.

### Personal information can include:

An individual's home address, date of birth, age, race, religion, identification or financial account numbers, benefit information, pay, medical, mental health or substance misuse information.

## Subpoenas

### Subpoenas for clients

- If a process server attempts to serve a subpoena on a client who is in a residential facility, team members will not acknowledge that the person is a client. Team members are encouraged to use the following statement with anyone who inquires about a client: "I can neither confirm nor deny that the person is or ever has been a client."

### Subpoenas for team members

- The team member to whom a subpoena is addressed will accept the subpoena. If the team member is not available, the process server should be referred to the Release of Information Department/Medical Records. When served with a subpoena, a team member must immediately notify his or her supervisor and the Release of Information Department/Medical Records.

### External request for client information and Records

- All external requests for client information, including medical records, must be referred to the Release of Information Department/Medical Records. Team members must not respond to subpoenas or other external requests for information about a client without the assistance of the Release of Information Department/Medical Records.

### Can someone really go to jail for disclosing confidential health information?

Yes. HIPAA imposes fines up to \$250,000 and/or imprisonment up to 10 years for intentional misuse of individually identifiable health information.

In addition, an intentional breach of confidentiality can result in separation of employment.

For more information, please refer to the Privacy, Confidentiality and Security Policy in the corporate policy manual.

## Using equipment and information systems responsibly

**How** we do what's right

We use company equipment, information and communication systems responsibly.

**Why** it matters

Our systems must be protected in order to keep confidential information and systems secure for our team members and clients.

**What** it means

We strictly prohibit the use of LifeView Group systems (including email, instant messaging, the internet or intranet) for activities that are unlawful, unethical or against the Code of Conduct.

### Examples of inappropriate usage:

- Accessing pornographic, obscene, offensive, harassing or discriminatory content
- Chain letters, pyramid schemes or commercial ventures
- Gambling, auctions or games
- Large personal files containing graphic or audio material
- Unauthorized mass distributions
- Violations of others' intellectual property rights
- Unauthorized access of systems for personal reasons
- Downloading unauthorized software to company computers

For more information on proper access and proper use of equipment, visit our Corporate Policy and Procedure Manual, available on the intranet.



## Cybersecurity awareness

We constantly depend on networks, databases, and other information technology. We must be careful to avoid hacks and breaches of our systems.

### How can you help?

Follow our policies and procedures that are in place to protect our systems.

Keep your passwords safe and do not share them with anyone, even your supervisor.

Watch out for phishing scams or other attempts to gain confidential information. Do not open suspicious links in emails.

If you are aware of or suspect an IT or data security issue, incident or loss of assets –including data or hardware – report it by contacting Risk and Compliance immediately at 850-418-4438 and completing an incident report.

## Safeguarding our reputation and other assets

**How** we do what's right

We are good stewards of our assets and take care to avoid loss, damage, waste and improper use.

**Why** it matters

We have an obligation to use our resources responsibly and only for LifeView Group business purposes.

**What** it means

We take care of LifeView Groups assets by:

- Safeguarding LifeView Group assets entrusted to us personally or to which we have access
- Taking steps to prevent loss, damage, destruction, theft, unauthorized or improper use, or waste of assets
- Not using company assets in ways that violate the law or are inconsistent with our Code of Conduct
- Being good stewards over LifeView funds
- Protecting non-physical assets like strategic plans, plans for acquisitions, non-public financial information, trademarks, processes, know-how and other proprietary information
- Keeping proprietary information confidential and disclosing it only to those who are authorized to know
- Taking precautions by avoiding discussions about sensitive matters over cell phones or in public places
- Not inappropriately sharing details about our buildings or computer systems, surveillance systems or our policy and procedures that are designed to prevent unauthorized access or criminal conduct at our facilities
- Not using confidential information or company assets for personal gain or to conduct personal business.



Team members understand that LifeView Group has the right to search any person, personal effects or vehicle at any premise owned, occupied or maintained by LifeView Group, including premises provided by the customer for LifeView Group to use.

## Responding to inquiries from the media

### How we do what's right

At LifeView Group, we speak with one voice when communicating with the media.

### Why it matters

We strive to anticipate and manage crisis situations in order to reduce disruption to our team members and clients, as well as maintain our reputation for quality. The media needs to have clear, complete and consistent communication about LifeView Group.

### What it means

The Marketing department will respond to the media in a timely and professional manner only through the designated spokesperson.

Any media inquiries or requests related to issues, press releases or use of a company logo should be referred to the Marketing department.



## Compliance resources

For further information on any of the items covered in this Code of Conduct:

1. Ask your leader.
2. Read the policies in the Corporate Policy Manual located on LifeView Group's intranet.
3. Access the Team Member Handbook on Lifeview Group's intranet.

### Corporate compliance contacts

#### Sandy Whitaker

Vice President of Corporate Development/  
Compliance Officer  
Phone: 850-495-2303

#### Angie Kahiapo

Director of Risk and Compliance/  
Team Member Relations  
Phone: 850 495-2314

#### Pam Smith

Director of Business Operations/  
Privacy Officer  
Phone: 850-495-2436

#### Mike Idoni

Chief Information Officer  
Phone: 850-450-2457

### Compliance hotline

Operated by an independent third party  
1-844-680-0573

[LifeViewGroup.ethicspoint.com](https://www.lifegroup.com/ethicspoint)



Team members can make anonymous reports using this hotline.

#### Examples of things to report:

Falsification, billing concerns, misuse of company resource/information, accounting issues, conflict of interest or other ethical violation.

Dear Team Member:

Every day, we may be faced with difficult decisions in our work environment. The purpose of this Code of Conduct is to guide you in those decisions to ensure ethical and compliant interactions across our organization. I encourage you to refer to it frequently to ensure that you and your teams are up-to-date and have no questions about service and behavioral expectations.



We cannot be prepared for every situation that may arise in the course of your work. Therefore, I want you to be comfortable in making the best decision. You can do that by reviewing the Code of Conduct. If you can't find the answer or are unclear about anything, consult with me, your leader or our Risk and Compliance Department. You may also call the anonymous compliance hotline.

Your commitment to doing the right thing for the right reason does not go unnoticed. Thank you for always working to a higher standard. It sets us apart from other organizations. In following this Code, you help us attract new team members, earn the trust of those we serve, encourage respect among teams and protect a legacy that we have been known for since 1954. On behalf of our leadership team, thank you for your commitment to our Mission, Vision and Values.

Sincerely,  
Sandy Whitaker  
Compliance Officer  
Vice President of Corporate Development  
LifeView Group

## Notes

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