Unlimited Services, Inc. Agency Policies & Procedures

POLICY #: 1.0

SUBJECT: Code of Ethics

POLICY: Unlimited Service Code of Ethics sets forth the principles and ethical standards that

underlie responsibilities and conduct. These principles and standards should be

used as guidelines when examining everyday professional activities.

1. Adherence to the Code of Ethics

All employees, board members, volunteers and vendors of Unlimited Services have an obligation to confront, address and attempt to resolve ethical issues per this code of ethics.

2. Honest and Lawful Conduct

One of our strongest assets is a reputation for integrity and honesty. All employees, board members, volunteers and vendors will accurately and honestly represent Unlimited Services and will not engage in any activity or scheme intended to defraud anyone of money, property or honest services. Examples:

- a) Employees are expected to fully cooperate and to be honest in written and oral statements concerning activities which affect US, Inc. Employees may not withhold information or impede any inquiry or investigation
- b) Employees who are arrested for, charged with, or convicted of any felony or misdemeanor must inform supervisor within 24 hours
- c) Employees are required to report abusive situations to supervisor or management staff immediately
- d) Employees will refrain from false or malicious statements concerning consumers or co-workers
- e) Employees will not engage in the theft or unauthorized use of property belonging to members, co-workers, or US, Inc.
- f) Employees will refrain from selling personal items to members served.
- g) Employees cannot buy personal items from members served
- h) Employees may not accept anything of monetary value from members served
- i) Employees cannot solicit funds from members served on behalf of a personal cause such as selling cookies, candy, home décor etc.
- j) Employees cannot personally accept tips or anything of monetary value.
- k) Employees cannot possess, use, trade, or sell weapons, alcoholic beverages, controlled substances, narcotics, stimulants, contraband, or other restricted articles during work hours or while on US, Inc. property.

3. Confronting Ethical Issues

When employees, board members, volunteers and vendors are uncertain whether a situation or course of action would violate the Code of Ethics, they consult with Directors knowledgeable about ethical issues or with other organizational entities such as CARF or resources listed at the end of this policy.

4. Disposition of Ethical Complaints

- a. Any ethical complaint will be brought to the attention of the Corporate Compliance Officer. The Corporate Compliance Officer will oversee the investigation, follow-up and, as applicable, resolution to investigations and other issues generated by the Compliance Program, including development of corrective action plans as needed. Responses will be timely, taking no more than 30-days from the date of the complaint. The Corporate Compliance Committee evaluates the results of the investigation and any recommendation of discipline. Resolution to the complaint will be presented to the Board of Directors. If the board by majority vote does not agree to accept the resolution, the board will seek legal counsel.
- b. The Corporate Compliance Officer is Kelly Meyers, Quality Assurance & Enhancement Director, who is the primary point of contact for monitoring and reporting on matters pertaining to corporate compliance. Joy Allyn, Finance Director, is the Corporate Compliance Officer back-up.

5. Professional Competence

Employees, board members, volunteers and vendors strive to maintain the highest levels of competence in their work; they recognize the limitations of their expertise; and they undertake only those tasks for which they are qualified by education, training, or experience. They recognize the need for ongoing education to remain professionally competent; and they utilize the appropriate scientific, professional, technical, and administrative resources needed to ensure competence in their professional activities. They consult with other professionals when necessary for the benefit of their stakeholders. Examples:

- a) Employees will maintain control of themselves always, even when provoked
- b) Employees may not engage in any outside activities or employment which may impair your independence or judgement or your ability to perform your assigned job duties.
- c) Employees will not participate in being a witness to legal documents such as powers of attorney, guardianship and advance directives.

6. Responsibility

Employees, board member, volunteers and vendors are aware of their professional responsibility to the communities and societies in which they live and work. They apply and make public their knowledge to contribute to the public good. Examples:

a) Employees are expected to conduct themselves in a manner that creates and maintains respect for Unlimited Services

b) Employees will treat all members, co-workers, visitors, funding sources and the public with dignity and respect always

7. Compliance with State and Federal Laws

All employees, board members, volunteers and vendors of Unlimited Services will comply with State and Federal laws in all their business dealings and avoid doing anything that could create even the appearance of impropriety. All claims for payment will be accurate and consistent with the requirements of all Federal and State health care programs. Examples:

- a) Employees are expected to keep track of work hours and report them fairly.
- b) Employees will not abuse their position or authority by requesting, forcing, or engaging members or co-workers in consensual or nonconsensual sexual relations or sexually-related activities including sexually suggestive remarks.
- c) Employees cannot have inappropriate physical contact with members, guardians, family members etc. on or off duty.

8. Cooperate with the Compliance Program

To be effective, all employees, board members, volunteers and vendors of Unlimited Services must work together to ensure the success of the Compliance Program. Each employee is responsible for acquiring sufficient knowledge to recognize potential compliance issues applicable to their duties. Any employee, board member, volunteer or vendor who believes or becomes aware of any violation of this Code of Ethics or any illegal activity by a director, officer, employee or another person acting on the behalf of Unlimited Services, shall promptly report the violation or illegal activity. All suspected violations of any State or Federal law, or any violations of Unlimited Service's own policies and procedures or Code of Conduct must be reported to the Corporate Compliance Officer.

Telephone contact number is Toll-Free <u>1-888-272-8605</u> <u>1-800-201-3796</u> ask for Compliance Officer

Or

Mail to:

Unlimited Services, Inc.

% Corporate Compliance Officer

PO Box 69

Guttenberg, Iowa 52052

Or

Access on-line submission form at www.unlimitedservices-inc.com.

a) Employees are expected to conduct themselves in a manner that creates and maintains respect for Unlimited Services, Inc.

9. Disclosure Program

Unlimited Services is committed to non-retaliation and to maintaining confidentiality and anonymity, as appropriate, with respect to disclosure to any violations to the Compliance Officer or submitted anonymously.

10. Confidentiality

Employees, board members, volunteers and vendors will strive to maintain the confidentiality of individuals served and other confidential information in accordance with applicable legal and ethical standards. Confidential information will not be used for any purpose other than to carry out the business of Unlimited Services, Inc. Examples:

- a) Employees are expected to treat all information and knowledge pertaining to members of US, Inc. as confidential
- b) Employees will not participate in boisterous or inappropriate discussions that would affect a member, family, member, or referral sources opinion of US, Inc.
- c) Employees cannot be visited by friends or relatives while working.
- d) Employees are advised to not friend members on Social Media to protect the employee from accusations of confidentiality and HIPAA violations. <u>Employees must not post any information, photos, or references to members on social media under any circumstances.</u>
- e) Employees are not to access or view any client's confidential information when you do not have a job-related reason to do so (snooping). This would result in a HIPAA violation under the minimum necessary standard.

11. Avoidance of Personal Gain

Under all circumstances, Directors, officers, board members and employees do not use or otherwise seek to gain from information or material received in a confidential context unless they have authorization to do so or until that information is otherwise made publicly available.

12. Public Communication

Employees, board members, volunteers and vendors adhere to the highest professional standards in public communication about their professional services, credentials and expertise, whether these communications are from themselves or from others.

13. Conflict of Interest

Directors, officers, board members and employees owe a duty of undivided and unqualified loyalty to Unlimited Services. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of Unlimited Services.

14. Business Relationships

Business transactions with vendors, contractors and other third parties shall be transacted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

15. Protection of Assets

All employees will strive to preserve and protect Unlimited Services assets by making prudent and effective use of its resources. Examples:

- a) Employees will not intentionally destruct member or US, Inc. property
- b) Employees may not use US, Inc. property without written approval from management staff.

16. Fundamental Values

The actions of all employees, directors, volunteers and vendors are based on the fundamental values of Unlimited Services which include respecting the worth, dignity and uniqueness of all persons as well as their rights and opportunities and obligations within a safe, caring environment. Examples:

- a) Employees are expected to refrain from verbal or emotional abuse to members or any US, Inc. staff.
- b) Employees are expected to refrain from recklessness and gross negligence that could result in an accident or the threat of a serious injury.
- c) Employees will report safety concerns, injuries, and unsafe working conditions immediately to supervisory staff.
- d) Employees cannot do personal errands or personal shopping while working

Compliance with the Code of Ethics is a condition of employment and shall be an element in evaluating performance for all employees. Violations of these standards will result in discipline being imposed up to and including possible termination.

Compatible forms with policy:

Code of Ethics Receipt and Acknowledgement Form - Corporate Compliance Violation Reporting Form

Resources

Office of Inspector General, U.S. Department of Health and Human Services

http://oig.hhs.gov

http://oig.hhs.gov/compliance/101/index.asp

http://oig.hhs.gov/compliance/compliance-guidance/index.asp

CARF Accreditation: www.carf.org

Approved: 2/15/2017; Revised: 12/4/19; Revised: 11/3/20 added Corporate Compliance Officer's Names Revised: 4/6/21 changed "conduct" to "ethics"; Revised: 3/31/22 added name of forms compatible with policy

Revised: 8/30/22av (added snooping); Revised: 2/22/24av (change Finance Manager to Director)

Revised: 12/30/24km (change Quality Assurance Coordinator to Director); Revised: 7/23/25km (add social media post)

Revised: 11/4/25km (updated 800 number)