

Garvey Manor's Corporate Compliance Plan fosters and promotes ethical business conduct. The Plan broadly defines a scope of conduct. It is not considered all-inclusive. It's guidance helps meet compliance standards, prevent breaches in compliance, and detect noncompliance if it occurs so that corrective action can be taken. The Plan is guided by the Corporate Compliance Committee and Compliance Officer. The Compliance Officer is available to all Garvey Manor staff, business associates and any concerned individual.

CORPORATE CODE OF CONDUCT Garvey Manor is committed to operating under the highest ethical and moral standards, complying with applicable legal requirements, maintaining values of honesty, integrity and impartiality in order to assure the residents' and the public's trust in Garvey Manor. Preservation of Garvey Manor's reputation requires observance of the code of conduct by all employed by or responsible for Garvey Manor. Principles of the Code of Conduct provides guidance for decisions and actions, They do not substitute for common sense, individual judgment or personal integrity.

Integrity - consistency in all activities conducted by or on behalf of Garvey Manor and promote honesty in all interactions within the organization. **Relationships with Residents** - employees and agents will demonstrate professionalism, integrity and respect in relating to residents. **Legal Compliance** - ensure all activity by or on behalf of the organization is in compliance with applicable laws. **Business Ethics** - employees should accurately and honestly represent Garvey Manor and must not engage in activities to defraud any person or entity. **Business Relationships** - transactions with providers, vendors, contractors and other third parties are free from improper inducements. **Confidentiality** - maintain confidentiality of information in accordance with applicable legal and ethical standards. **Conflict of Interest** - potential conflict exists whenever a Board Member, employee, agent or representative of a associate, agent or vendor has an outside interest, direct or indirect, which conflicts with the individual's duty to Garvey Manor or adversely influences the individual's judgment in relation to his or her responsibilities to Garvey Manor. The appearance of a conflict of interest may be just as damaging to Garvey Manor's reputation as a real conflict would be. All conflicts of interest must be disclosed, avoided and eliminated. **Protection of Assets** - all employees strive to preserve and protect Garvey Manor's assets by making prudent and effective use of its resources and properly and accurately reporting its financial condition. **Reporting Suspected Misconduct** - employees and agents have an affirmative obligation to report suspected violations of any statute, regulation, or guideline applicable to any State or Federal health care program or of Garvey Manor's own Policies and Procedures. This can be done by anonymously putting a written report in the Compliance Drop Box, located in the staff break room on the Concourse Level. Concerns of possible compliance issues can also be given to or mailed directly to the Administrator or the Compliance Officer. Garvey Manor's Corporate Compliance Officer and Committee will conduct investigations into instances of claimed misconduct or noncompliance. Garvey Manor employees are required, when requested, to assist the Compliance Officer in these investigations. If warranted, corrective action initiatives and, when required, disclosures to governmental agencies will be accomplished. Garvey Manor will not tolerate retaliation against anyone who reports suspected abuse in good faith, nor will Garvey Manor tolerate false reporting or abuse of the reporting processes.

COMPLIANCE STANDARDS Laws and regulations establish obligations with which Garvey Manor must comply. Any employee, business associate or agent who violates these laws or regulations not only risks individual indictment, criminal prosecution, or civil actions but also subjects Garvey Manor to disciplinary risks. Any employee, business associate or agent who violates these laws may be subject to disciplinary measures relating to affiliation with Garvey Manor.

POLICIES, PROCEDURES, PROTOCOLS Garvey Manor has policies, procedures and protocols that direct provision of services and ensure that operations are conducted according to the facility's values, applicable professional standards and regulations. These policies, procedures and protocols are to be followed throughout the facility.

EMPLOYEE DUTIES UNDER THE PLAN All staff members are educated about the Plan upon hire and annually thereafter. Each employee's compliance performance will be taken into account in connection with performance evaluations. Supervisors have responsibility to ensure that persons under their supervision are advised of their responsibilities under the Plan and under applicable laws and regulations. Conduct that is in violation of this Plan may subject the employee to disciplinary action, including suspension or termination. Appropriate disciplinary measures shall be imposed on a case-by-case basis, consistent with the disciplinary scales contained in the Employee Handbook.

SELF-MONITORING/AUDITING helps determine the effectiveness of the Plan's implementation. Ordinarily audits are part of the Performance Improvement program, mock surveys, random testing and other measures. Directed audits will be conducted if suspected episodes of misconduct occur. Actions to address or correct potential or real compliance issues will be recommended or enacted through the Corporate Compliance Committee.

If you have questions or wish to view a full copy of the Plan, please contact Garvey Manor's Administrator, Sister Joachim Anne Ferenchak, or the Corporate Compliance Officer. Mrs. Pam Sellers. at 814 695-5571