

# Code of Ethics and Business Conduct



**HealthCARE Redefined**

*Signature*  
HealthCARE

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## Dear Fellow Stakeholder,



This Code of Ethics and Business Conduct is one of the most important documents you will read while at Signature and sets forth the ethical and legal standards that guide every Stakeholder in the company.

In our Guiding Principles launched at the founding of the company, it was collectively agreed that acting ethically and responsibly from day one was paramount to every stakeholder. I want to make sure that each and every one of our Stakeholders clearly knows, understands, believes, and lives this Company's philosophy and expectation. We pride ourselves on high ethics and integrity, and need to live and enforce these principles, every day, in everything we do, write, and say.

Being an organization with the highest ethical standards has been at the sacred fabric of who we are at Signature HealthCARE. Sometimes, I feel redundant when I talk about our family based organization having a corporate soul that can only be lost through unethical behavior somewhere in the Revolution!

This written document describes the covenant of how Signature HealthCARE conducts its business so that we stay true to our three pillars – Learning, Spirituality and Intra-preneurship and live our mission and vision to radically change the landscape of healthcare forever.

We have a responsibility to serve our residents, stakeholders and communities with compassion

and caring. This Code of Ethics and Business Conduct is intended to provide you with guidance in performing this service responsibly and ethically. Healthcare is a highly regulated industry and it is extremely important that you understand what you can and cannot do in compliance with State and Federal regulations. We believe wholeheartedly in our mission and values, created by our own stakeholders, and we only ask that all our stakeholders act in accordance with these values.

This document also ties closely to our company's list of Guiding Principles, two in particular:

- We are a resident advocate, first, last and always
- Mistakes are optional, the truth is not.

I ask you to please read this document carefully, and if you have any questions, discuss them with your supervisor or our Compliance Department. If you feel as though you are ever in a position where someone tells you or pressures you to do something that is outside of our core values, whether directly or indirectly, I want you to contact Signature's Corporate Compliance Officer at [Compliance@signaturehealthcarellc.com](mailto:Compliance@signaturehealthcarellc.com) or call our CAREline at 888-392-8886. We will not permit any retaliation against you for any good faith reporting of violations or concerns and we are committed to investigating any issues that you bring to our attention.

I would like all of you to remember that this Code of Ethics and Business Conduct cannot possibly cover every potential situation that you may encounter. Trust your judgment— if you feel that something is not right, please contact any of the resources mentioned above for guidance. As our organization continues to grow, we must conduct our business honestly, respectfully and with integrity.

If we do so, I have absolute confidence that we will achieve the Signature mission and vision. Thank you very much for your dedication and compassion.

A handwritten signature in black ink that reads "E. Joseph Steier, III". The signature is written in a cursive, flowing style.

E. Joseph Steier, III, CEO

## INTRODUCTION

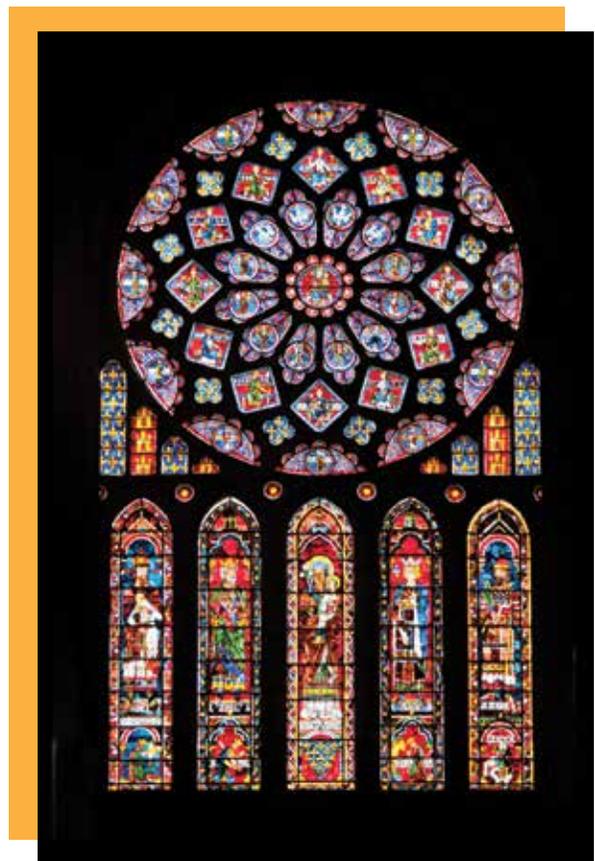
Signature HealthCARE, LLC and its affiliates (“Signature”) are committed to ethical business conduct. This Code of Ethics and Business Conduct describes Signature’s core values and expectations for all stakeholders and is designed to provide guidance to you on how to perform your job responsibilities ethically and legally. It supplements the Stakeholder Handbook and the specific policies and procedures that apply to your job.

The healthcare industry is highly regulated and certain business practices that may be permissible elsewhere may be illegal for health care providers. We expect you to comply with all applicable laws and regulations. Our business dealings with stakeholders, residents, families, suppliers, government officials and the public should always be fair and honorable.

We have all seen examples of situations where the actions of even a few people can seriously harm or destroy the integrity and reputation of a company. We need your help to be sure that this does not ever happen to Signature.

Please make time to review this entire Code of Ethics and Business Conduct so that you will make the right decisions and identify any potential violations of the policy. To confirm that each of us understands and accepts responsibility for complying with Signature’s Code of Ethics and Business Conduct, every stakeholder is required to read, comply with, sign and return the Commitment to Compliance on the last page.

We appreciate your dedication to Signature’s mission to radically change the landscape of healthcare forever!



### Ask Yourself:

- Have I fully complied with laws and regulations?
- Did I provide and document appropriate care for my residents?

## COMPLIANCE PROGRAM

Signature HealthCARE believes in a robust Compliance Program that teaches, enforces and reinforces its expectations of adherence to high ethical standards and all applicable regulations and laws. Signature's Compliance Program is administered by the Compliance Department and led by the Compliance Officer. Signature's Compliance Program contains seven core elements:

- Oversight
- Standards, Policies and Procedures
- Internal Reporting
- Training and Communication
- Auditing and Monitoring
- Investigation and Response
- Enforcement and Discipline

### **Who is Covered by the Code of Ethics and Business Conduct?**

The Code of Ethics and Business Conduct applies to all board members, officers, stakeholders, contractors, subcontractors, vendors or any other entity who Signature has entered into a contract or has a business relationship with to conduct business on behalf of Signature. All of these individuals must review, adhere to and enforce the Code of Ethics and Business Conduct to ensure that all actions are in compliance with the established mission and vision of Signature.

## RESIDENT CARE

**Resident Rights.** Signature is committed to providing quality care, dignity and respect to our residents in compliance with state and federal resident rights laws. Resident abuse or neglect is never tolerated and you

must immediately report any incidence of suspected or observed abuse or neglect of a resident. You may not borrow money from residents or their families. We do not tolerate stealing of residents' property or funds and violators will be reported to the appropriate authorities for prosecution.

**Relationships with Residents.** You may not date or have sexual relations with residents. Additionally, if a stakeholder serves as the responsible party for a resident and this relationship was established before admission to the facility, the Legal and Compliance department should be notified to review the relationship prior to admission.

**Healthcare Decisions.** You should always respect the rights of our residents and their legal representatives to make healthcare decisions in accordance with applicable laws. If a resident or their representative's decisions conflict with Signature policies and procedures, please contact the Signature Legal Department for guidance.

**Resident Trust Funds.** Resident trust funds may not be used for any purpose other than for the benefit of the resident and as permitted by applicable law. Resident trust funds are for the exclusive use of the resident and can be used only upon written approval of the resident or the resident's legal representative.

**Customer Service.** You should always provide excellent customer service and respond appropriately to all concerns expressed by our residents, families and representatives regarding admissions, treatment and quality of care. They want and deserve answers and responses to their questions and concerns. You are responsible for either directly addressing such concerns or informing a supervisor of the concern, so that the matter is properly reviewed, investigated and addressed.

## STAKEHOLDER CONDUCT

**Compliance with Laws.** You must comply with all applicable federal and state laws and regulations in all situations.

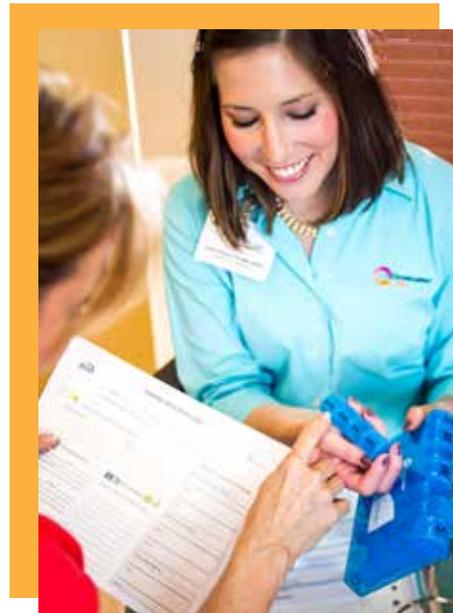
**Professional Standards.** You are expected to adhere to the highest professional standards at all times. This includes behaving in a professional manner during work and at work related events.

**Licensure, Certification and Exclusion.** Only qualified personnel are permitted to provide care to our residents. Positions requiring licenses or certifications will be filled only by persons holding such licenses or certifications. If you are in a position that requires a license or certification, you are responsible for verifying your information with the respective licensure/certification boards and maintaining your licenses and certifications. If there is/was discipline including probation, suspension, termination, sanctions or violations against your current or prior license or certification, you must immediately report this to your supervisor. This includes any pending discipline, suspensions or terminations.

Signature does not hire, do business with or retain employment of individuals, entities or vendors who appear on the exclusion list maintained by the Office of the Inspector General (OIG) or debarred by the General Services Administration (GSA) or the System for Award Management (SAM.gov) or is on an abuse registry or has a criminal background that would bar employment per the human resources policies. Before employing or entering into a contract, Signature screens the stakeholder against the federal (OIG & GSA & SAM) and the state exclusion lists.

If during the course of employment, you appear on one of these lists, you should immediately notify the Compliance Department.

Sanctions, violations, terminations, probation or suspensions against your current or a prior license/ certification must be reported on the application at the time of employment. Signature will not hire any person who has been excluded from participating in the Medicare or Medicaid programs, is listed on any abuse registry or has a criminal background as set forth in our human resources policies.



**Signature Policies.** You are expected to comply with the provisions of the current Signature Stakeholder Handbook and all other Signature policies and procedures. Compliance Department Policies include policies on HIPAA, Gifts, and Conflicts of Interest. These policies and other Compliance Policies can be located on the Signature Intranet under Departments-Compliance.

**Discrimination-Free and Harassment-Free Workplace.** We do not permit any discrimination or any form of harassment based on a person's race, religion, color, gender, national origin, sexual orientation, military duty, age, disability, or veterans status, or any other basis protected by Federal, State or local law. All Board

Members, Officers, Stakeholders and Contractors share in the responsibility of preventing discrimination and harassment and should report any witnessed incidents to of this conduct to the CAREline at 888.392.8886.

## GIFTS AND GRATUITIES

**Referral sources.** We do not pay for referrals. It is a crime under Federal and State laws for anyone to offer or accept a bribe, kickback, or other thing item of monetary value for referring residents or other reimbursable business. Therefore, you may not, under any circumstances, solicit, receive, or accept from any person or entity, nor offer or give to any person or entity, anything of material value if that person or entity is in a position to refer residents or other reimbursable business to Signature or if Signature is in a position to refer residents or reimbursable business to that person or entity except as specifically permitted by law. Cash or cash equivalents are strictly prohibited. All agreements with any referral sources must be put in writing and submitted for review to the Signature Legal Department.

**Residents.** You may not accept gifts or tips from residents, families or others that compensate or reward an individual stakeholder because it could give the impression that we will favor a particular resident. Acceptance of gifts from residents, families or others is permissible if they are given to the facility for distribution among the stakeholders or for the general benefit of the facility, but only if the gift is unsolicited by a stakeholder.

**Physician Gifts.** As long as the physician gift is not in exchange to solicit, receive or accept referrals, the gift to the physician cannot exceed nominal value and the statutory limit. If a gift is received or given over nominal value, the Stakeholder must notify his or her immediate supervisor and the Legal Department within 24

hours. Signature cannot make payments for a physician's travel or participation in any conference. Similarly, no physician's continuing education fees shall be paid, and there shall be no discounted billing services or interest-free loans as part of any gift to a physician, unless such benefits are specifically allowed as part of a permissible physician agreement. Gifts to physicians must be logged and tracked to ensure that the statutory limits are not exceeded.



**Government and Public Agency Representatives.** Federal and certain state laws prohibit gifts to government and public agency representatives with the intent of influencing governmental decisions. You may not give any gift or gratuities of value to government or public agency representatives.

**Return of Gifts.** If a stakeholder or a department receives a gift that is not permitted, the gift should be returned if feasible. If the gift is not able to be returned, the gift must be raffled off to all stakeholders with the proceeds from the raffle donated to the Compassion Fund. All gift cards, regardless of the amount, will be included on the stakeholder's payroll check as taxable income.

## Example:

### What would you do if:

- The local hospital CEO offered you tickets to a pro football game, and you are the admissions director for the facility?

**Answer:** Not accept! This is a gift from a source that refers residents to our facility and by accepting this gift, whether or not it is the intent, could create the appearance that business will be influenced.

- A resident offered you \$20 because she liked the way you helped her?

**Answer:** This gift should be politely declined and returned to the resident. There are multiple reasons this gift should be declined, including that cash or cash equivalents are strictly prohibited and this gift could be construed as payment to show favor to someone.



## KICKBACKS, REFERRALS AND BRIBES - ANTI-KICKBACK AND STARK

**Anti-Kickback.** The federal Anti-Kickback Statute (“Anti-Kickback Statute”) is a criminal statute that prohibits the exchange (or offer to exchange), of anything of value, in an effort to induce (or reward) the referral of federal healthcare program business including Medicare and Medicaid. The

Anti-Kickback Statute is broadly drafted and can include kickbacks, bribes and rebates that were made directly or indirectly. The Anti-Kickback Statute establishes penalties for individuals and entities on both sides of the prohibited transaction. Conviction for a single violation under the Anti-Kickback Statute may result in a fine of up to \$25,000 and imprisonment for up to five (5) years. In addition, a conviction results in mandatory exclusion from participation in federal healthcare programs. The government may also assess civil money penalties, which could result in treble damages plus \$50,000 for each violation of the Anti-Kickback Statute.

To ensure compliance with the Anti-Kickback Statute, Signature prohibits accepting or offering to provide anything of value in exchange for the direct or indirect referral of residents or business, or in return for buying services or supplies. Some examples include:

- Making payments to or receiving payments from referral sources that exceed fair market value
- Providing to or accepting from referral sources any free or discounted goods or services
- Establishing payment arrangements with vendors, suppliers or referral sources where reimbursement is based on the amount of volume of business rather than the value of the services provided
- Making payments or providing courtesies in exchange for referrals

**Stark.** The Physician Self-Referral Law, or Stark Law, is a limitation on certain physician referrals. Stark prohibits physicians from making referrals of designated health services for Medicare or Medicaid residents if the physician or an immediate family

member of the physician has a financial relationship (such as ownership, investment, or compensation) with the provider.

To ensure compliance with these laws, a written agreement must be in place with all referral sources and with purchasers of Signature's services. If you have questions, the Legal Department should be notified.

**Conflicts of Interest.** You have a duty to be loyal to Signature and work on behalf of its interests. You should not engage in any activities that conflict with the interests of Signature or its residents. A "conflict of interest" may exist if your private interests interfere or appear to interfere in any way with the interests of Signature and/or our residents. While it is not possible to list all of the potential conflicts of interest, here are a few examples: having a material financial interest in a firm that does business with Signature, or serving as a director, officer or consultant of a company that is a competitor of Signature. You should disclose any potential conflict of interest on the application when seeking employment, to your supervisor at the time of hire or as they occur. See the Stakeholder Handbook for definition of Conflict of Interest.

### **Example:**

*Is this a Conflict of Interest? As a Signature stakeholder, you are employed as a CNA at a facility. You also have a separate private business in which you cook and provide meals to the community. While at work, you reach out to residents who are ready for discharge to assist them in obtaining meals when they are home? Yes, this is a conflict of interest and is prohibited. You cannot gain a secondary financial benefit through resources obtained by working at Signature.*

### **Government Inquiries.**

Signature has a policy of cooperating with all government inquiries, requests for

information or investigations. In order to make certain that all government inquiries, requests for information or investigations are handled in a coordinated and efficient manner, you should immediately report all such matters (other than routine government contact such as state surveys and reimbursement audits) to your supervisor and to the Signature Legal Department.

If you are contacted by a government official or agent during business hours or at home, you should request identification, obtain the name and telephone number of the agent, and communicate to the agent that an appropriate management employee will contact them promptly. You should be respectful and courteous.

Surveyors conducting licensure and certification surveys should have access to all routine information. If any question arises during a survey regarding the surveyor's request for information, please contact the Signature Legal Department.

## **FINANCIAL PRACTICES HEALTHCARE FRAUD AND ABUSE**

Signature is committed to detecting and preventing healthcare fraud and abuse. The federal government and certain states have enacted criminal and civil laws pertaining to the submission of false or fraudulent claims for payment or approval to the federal and state governments and to private payors. These false claims laws, such as the Federal False Claims Act, 31 U.S.C. Sections 3729-3733, provide for criminal, civil and administrative penalties, and provide government authorities with broad authority to investigate and prosecute potentially fraudulent activities, and also provide anti-retaliation provisions for individuals who make good faith reports of waste, fraud and abuse.

Certain states also have their own false claims acts. Please review the Signature Stakeholder Handbook and the Signature Intranet for more extensive information regarding federal law and applicable state laws.

Any suspected false claims violations should be reported to the Corporate Compliance Officer, the Signature Legal Department or the CAREline at 888.392.8886.

*“Fraud” is defined as “The intentional deception or misrepresentation that an individual knows to be false (or does not believe to be true) and makes, knowing that the deception could result in an unauthorized benefit to himself or another person.”*

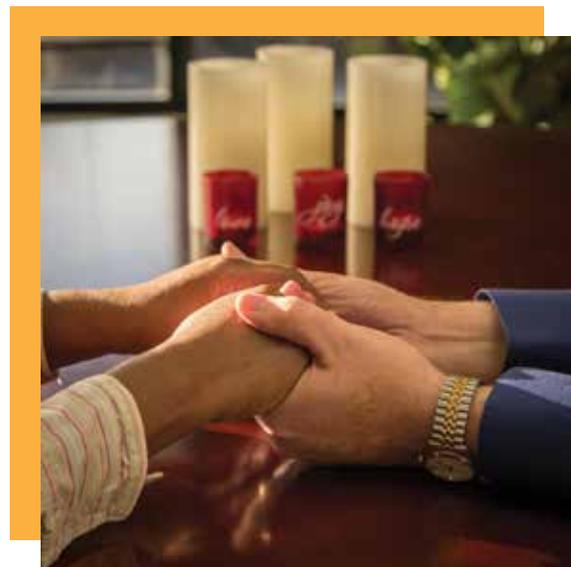
*“Abuse” in this context is defined as “Incidents or practices of providers that are inconsistent with sound medical practice and may result in unnecessary costs, improper payment, or the payment for services that either fail to meet professionally recognized standards of care or are medically unnecessary.”*

#### **Billing, Claims and Documentation.**

Signature is committed to complete and accurate billing for all services provided to our residents. We will only bill for services actually provided, in accordance with government and contractual requirements. All claims for payment must be truthful and supported by adequate documentation. Payments must be accurately posted to accounts. Billing codes must accurately describe the services rendered. Resident assessments, care plans and clinical records should be correct and complete. Falsification of records is strictly prohibited, including backdating of records, with the exception of appropriate late entries duly noted and made consistent with applicable professional and legal standards. You should immediately report any inaccuracies in bills that are discovered subsequent to the submission of the bill or any

improper documentation to your facility Administrator, Director of Nursing and/or Regional Business Office Consultant so that appropriate action may be taken.

**Cost Reporting.** Signature is required to submit various cost reports to federal and state governments in connection with its operations and to receive payments. We are committed to ensuring that all Medicare and Medicaid cost reports are accurate and reflect only allowable costs incurred by Signature.



**Foreign Corrupt Practices Act.** Signature will comply with the Foreign Corrupt Practices Act [15 U.S.C. § 78dd-1, 15 U.S.C. §§ 78m(b)(2)(A) and (B) of 1977, which makes it a crime for any US individual, business entity or employee of a US business entity to offer or provide, directly or through a third party, anything of value to a foreign government official with corrupt intent to influence an award or continuation of business or to gain an unfair advantage.

**Financial Documentation.** All of Signature’s books, records, accounts and financial statements must be maintained in sufficient detail, must appropriately reflect Signature’s transactions and must conform both to applicable legal requirements and to Signature’s system of internal controls.

Signature requires honest and accurate recording and reporting of information, including expense reports, in order to make responsible business decisions. You must document and record your business expenses accurately. If you are not sure whether a certain expense is legitimate, ask your supervisor or Corporate Controller.

#### **Petty Cash and Purchasing Cards.**

Petty cash and purchasing cards shall be used only for appropriate business purposes. Signature's policies and procedures regarding petty cash and purchasing cards shall be followed.

**Investigations.** Signature will investigate all allegations of improper billing in accordance with our fraud policies and procedures. Additionally, the Internal Audit Department will routinely audit and report on financial practices. Stakeholders should contact the CAREline to report any potential billing issues at 888.392.8886.

#### **Example**

*Q. What if I discover that a co-worker has billed Medicaid for a resident that did not receive care at our facility?*

*You should report it to your supervisor immediately and contact the CAREline at 888.392.8886*



## **SIGNATURE ASSETS**

**Assets.** Signature funds, anything acquired using Signature funds, and anything developed using the skills of our stakeholders in connection with their employment are assets of Signature. You may not use Signature's assets for any improper or unlawful purpose and all stakeholders are expected to protect our assets against loss, theft, damage, and misuse. You should not use Signature assets for non-Signature purposes or use the personal services of other employees working on Signature time. If you separate from employment with Signature, all electronic and paper copies of Signature information, reports and manuals, and all Signature equipment including, without limitation, computers, printers, and mobile electronic communication devices must be returned to Signature immediately.

**Confidential Information.** You should not share confidential information with anyone inside or outside the company, except as may be necessary for the performance of your work. This obligation to maintain confidentiality shall continue even after you are no longer employed by Signature.

Confidential information includes, but may not be limited to, the following:

- **Company Information.** Information regarding operations and business strategies including, without limitation, policies, development plans, data points, finances, and intellectual property.
- **Resident Information.** The Privacy Rule of the Health Insurance Portability and Accountability Act (HIPAA) protects the privacy of certain health information and restricts access to such health information. Stakeholders are expected to comply with all applicable provisions

of HIPAA. Resident information including names, social security numbers, diagnoses, treatment information, and all other health related information is considered protected health information. The health information can be in the form of written communications, verbal interactions or electronic.

In order to appropriately protect health information, it is important to keep passwords and security codes confidential. Documents should be protected in the facility and during travel and you should not utilize text messaging as a means to communicate health information.

### **Breaches of Protected Health Information.**

A breach is generally defined as an impermissible use or disclosure under the Privacy Rule that compromises the security or privacy of the protected health information. A potential breach of health information must be appropriately investigated and addressed in order to show compliance with the regulations. As a stakeholder, you must disclose any situations that may potentially compromise the security or privacy of health information. Potential breaches should be immediately reported to your facility leadership and also to the Compliance Officer or the CAREline at 888.392.8886 in order to be appropriately investigated.



**Common Breaches.** It is important to be aware of the most common breaches of health information to ensure adequate reporting. Here are a few examples of breaches of health information:

- Misdirected faxes that contain health information
- Providing health information to an unauthorized individual
- Health information that is lost or stolen from a vehicle
- Posting of health information or resident images on social media sites without the appropriate authorization

### **Example**

*What do I do if: A stakeholder misdials a fax number and inadvertently faxes health information to the wrong recipient?*

*Answer: Immediately contact your supervisor and the CAREline at 888.392.8886. Additionally, the recipient of the fax should be contacted and asked to destroy the misdirected information.*

**Computer Systems and Electronic Communication.** All electronic resources must be used in accordance with Signature policies. Software may only be used as permitted by the applicable licensing agreements. You may not bring mobile phones or cameras into resident care areas without express permission from the Administrator of the facility. You should be careful about using electronic mail to communicate confidential, proprietary or sensitive legal, financial or personal matters, because these communications may be accessed by third parties at a future time, even if the communication is deleted. Text messaging of health information is strictly prohibited. Signature maintains the right to monitor all electronic communications

that are transmitted through Signature equipment, including its servers. Please refer to the Stakeholder Handbook for additional information.

Information transmitted by, received from, downloaded from, or stored on any Company property or personal property being used for business purposes, including but not limited to the Company's intranet, internal social media sites and external internet, as well as emails, voicemail, text messages, is and shall at all times remain Company information. Stakeholders should have no expectation of privacy or confidentiality in this information or with respect to any Company property, regardless of password or stakeholder initiated protection. All Company property and information, including electronic communications, will be monitored and reviewed by the Company from time to time, and subject to inspection at any time, with or without advance notice to Stakeholder. Please refer to the Stakeholder Handbook for additional information.



**Copyrights and Trademarks.** You are expected to comply with applicable copyright and trademark laws. If you make, acquire or use unauthorized copies of print or online publications or infringe on any trademarks in violation of the law, you may be subject to disciplinary action. You may contact the Signature Legal Department if you have any questions about whether a proposed action would infringe on any

copyrights or trademarks.

**Social Media.** Signature embraces the use of social media, as outlined in the Stakeholder Handbook. The Company understands that social media can be a way to share your life and opinions with family, friends and co-workers. However, use of social media also presents certain risks and carries with it certain responsibilities. Keep in mind that any of your conduct and postings online could affect your job performance, the performance of fellow stakeholders, or otherwise adversely affect residents, family members, suppliers, people who work on behalf of the Company, or the Company's legitimate business interests; if your online conduct has an adverse effect on those items just listed, it could result in disciplinary action up to and including termination of employment.

Social media can compromise regulatory compliance if not carefully followed. Signature Stakeholders should understand that social media (in particular, the posting or sending of any resident health information, photos or personal stories) can place the company at risk if our policies are not carefully followed. At all times, before posting or sending information, you must make sure that an appropriate, written authorization from the resident, responsible party, or stakeholder has been obtained. If this written authorization is not in place, the information should be removed immediately and reported to the Compliance Department or the CAREline at 888.392.8886. Other guidance for social media can be found in the Stakeholder Handbook and the Social Media Policy.

**Employee Information.** Stakeholder information and files are confidential and may only be accessed in accordance with our human resources policies and procedures and state and federal law.

## INTERNAL REPORTING AND RESOLUTION OF ETHICS AND BUSINESS CONDUCT ISSUES

If you have any questions regarding any ethical issues, or become aware of any violations of this Code of Ethics and Business Conduct you should:

1. Talk to your supervisor.
2. Talk to another member of the management team if you are not comfortable talking to your supervisor or are not satisfied with the response you received from your supervisor.
3. Contact the Corporate Compliance Officer or the Signature Legal Department.
4. Concerns, complaints or other violations of the code or company policies may also be reported to the Compliance Officer or the Compliance Department in various ways:

### BY MAIL, SENT TO

Signature HealthCARE  
12201 Bluegrass Parkway  
Louisville, KY 40299  
Attn: Compliance Officer

### BY EMAILING

compliance@signaturehealthcarellc.com

### BY CALLING THE TOLL FREE

CAREline at 888-392-8886  
(24 hours a day/7 days a week)

### BY CONTACTING THE COMPLIANCE OFFICER DIRECTLY AT 1-800-793-4777

**How the Concern is Treated.** Signature takes all concerns that come into the CAREline, Compliance Department or other reporting venue very seriously. We want you to be assured that all concerns will be heard and addressed. Violations or potential violations of the Code of Ethics and Business Conduct must be reported

so that appropriate actions can be taken. When appropriate, you may be contacted by the investigator or another Signature representative to discuss either the investigation process or the findings of the reported issue. In the event that disciplinary action is taken against a stakeholder as a result of the investigation, that information will remain private and confidential and will not be shared.

**Non-Retaliation.** Signature encourages open communication and reporting of all actual or potential issues or violations of the Code of Ethics and Business Conduct. If you fail to report a violation you may be subject to disciplinary action up to and including termination of employment. Retaliation, retribution, intimidation or harassment of any stakeholder or other individual who makes a “good faith report” regarding a possible violation of the Code of Ethics and Business Conduct will not be tolerated. “Good Faith” means that you reasonably and honestly believe you are accurate in your perception and assessment of the situation you are reporting. Additionally, any Signature stakeholder who condones retribution, retaliation or harassment in any way will be subject to disciplinary action up to and including termination of employment.

**Cooperation of Investigation.** Signature requires all stakeholders to actively and willingly participate in all investigations. This participation is not limited to production of information or discussion related to the issues under investigation. Signature prohibits the withholding or the destruction of any information whether electronic or written that is associated or potentially associated with an active investigation. The unwillingness to participate in investigations may lead to stakeholder disciplinary action up to and including termination of employment.

## Elder Justice Act Reporting

**Requirements.** The Federal Elder Justice Act requires all Signature stakeholders to report any reasonable suspicion of a crime against any individual that is a resident of, or is receiving care from, one of our facilities. The report should be made to a local law enforcement agency and to the Secretary of the Department of Health and Human Services. If the suspected crime involves serious bodily injury, the report must be made within two (2) hours of forming a reasonable suspicion of the crime. If the suspected crime does not involve serious bodily injury, the report must be made within twenty four (24) hours. Individuals that fail to comply with these reporting requirements can be subject to a fine of up to \$200,000 and may be excluded from participation in any federal healthcare program. In addition, if the failure to report the crime results in further injury to the victim or in harm to another individual, the penalty may be increased to \$300,000. Signature does not retaliate against an individual who lawfully reports a reasonable suspicion of a crime under the Elder Justice Act. Signature will not discharge, demote, suspend, threaten, harass, or deny a promotion or other employment-related benefit to a stakeholder, or in any other manner discriminate against a stakeholder in the terms and conditions of employment because of lawful acts done by the stakeholder, or file a complaint or a report against a stakeholder with the appropriate state professional disciplinary agency because of lawful acts done by the stakeholder.

**Please contact the Signature Legal Department with any questions you may have regarding these reporting requirements.**

## SIGNATURE'S COMMITMENT TO LIFELONG LEARNING

Signature is committed to providing all Stakeholders with training to inspire growth



for our residents, stakeholders and the community. We believe revolutionary and lifelong learning has no limits and can change lives for generations. Annually you will receive compliance training that covers the Code of Ethics and Business Conduct as well as Fraud and Abuse and HIPAA. You are required to take this training upon hire and annually. Other training will be implemented from the learning center that focuses on other job specific requirements. Generally, those trainings will contain components about appropriateness of care/services, privacy and security areas or other risks identified as part of your role at Signature HealthCARE. It is the expectation that all stakeholders comply with mandatory training requirements.

## AMENDMENTS

We reserve the right to amend or modify this Code of Ethics and Business at any time to ensure that Signature continues a culture of compliance and sound business ethics.

# COMMITMENT TO COMPLIANCE

I understand how the contents of the Signature Code of Ethics and Business Conduct relate to my position with Signature HealthCARE. I have reviewed and agree to comply with the terms of the Signature Code of Ethics and Business Conduct and conduct myself in an ethical, legal and responsible manner at all times. I understand that if I fail to do so, I may be subject to disciplinary action up to and including termination of employment.

Stakeholder signature \_\_\_\_\_ Date \_\_\_\_\_

Print name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Employment location: \_\_\_\_\_

**\* Copy of this should be retained in the stakeholder's employment file.**