



Health. Wellness. And Wonders.

The Center for Discovery CODE OF CONDUCT

Introduction

Throughout its history The Center for Discovery (“The Center”) has maintained a reputation of integrity and excellence in its programs and services. The Center’s accomplishments are maintained through its commitment to the individuals served and their families and by maintaining the highest of ethical standards throughout its programs. This Code of Conduct is a formal statement of The Center’s commitment to the standards and rules of ethical business conduct.

The Code of Conduct applies “all affected individuals” These are members of the Center for Discovery Community which include all affected employees, all affected appointees and persons associated with TCFD (applies to any person or affiliate who is involved in any way with TCFD such that the person or affiliate contributes to TCFD’s entitlement to payment under the Medical Assistance Program and who is not an employee, executive , or governing body member e.g. independent contractors, interns, students, volunteers, and vendors), all executives, all members of the Board of Directors , and others working on behalf of other entities doing business with The Center and its related corporations (hereafter collectively referred to as The Center agents). The appointment and retention of all Center employees and agents is contingent upon acceptance and compliance with this Code of Conduct.

The Center agents and employees must conform to the highest ethical business standards and to meet or exceed legal obligations in the performance of their efforts on behalf of The Center.

The Center is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and firmly and fairly disciplining and / or retraining individuals who violate the Code of Conduct, including those who neglect to report a violation. Therefore all Center employees and agents must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

While these standards addressed in the Code of Conduct are intended to guide Center employees and agents in the course of their day-to-day responsibilities related to The Center, they do not replace any Center or program-specific policies and procedures. Employees and agents must seek direction from their supervisor, other Center management staff or the Corporate Compliance Officer when issues arise that may not be specifically addressed in the Code of Conduct or in existing policies.

Compliance with the Law

The Center for Discovery is committed to conducting its programs and services in a lawful and ethical manner, in full compliance with federal, state and local laws and regulations. All Center

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employees and agents will adhere to the highest standards of conduct through strict observation of all applicable legal and regulatory requirements.

The Center for Discovery will employ or contract only with individuals or entities with proper credentials, experience and expertise.

All business communications on behalf of The Center with outside individuals or entities, including claims for payment or reimbursement of any kind, will be truthful and, where appropriate, substantiated by accurate and complete records.

Neither The Center for Discovery, nor its employees nor agents shall pay employees, physicians, or other health care professionals, directly or indirectly, in cash or by any other means, for referrals of patients. Every payment to a referral source must also be supported by proper documentation that the services contracted for were in fact provided.

The Center for Discovery will bill only for services actually rendered and which are fully documented in patients' medical records/ or program charts. If the services must be coded, then only billing codes that accurately describe the services provided will be used.

Employees and agents who perform billing and/or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with federal and state laws and regulations and Center policies. Submission of claims for payment or reimbursement of any kind that are false, fraudulent or inaccurate, or falsification of medical, time or other records will not be tolerated.

The Center for Discovery shall act promptly to investigate and correct any and all errors in claims that have been discovered after claims have been submitted.

Ethical Business Practices

The Center for Discovery is committed to ethical business practices with the expectation that all Center employees and agents adhere to the highest ethical standards of behavior while performing Center business. To accomplish this, all members of The Center community must obey the laws and regulations that govern their work and always act in the best interest of the people we serve, their families and The Center.

Employees and agents shall not reveal any confidential information obtained concerning The Center for Discovery or use such information for personal gain.

No employee or agent should subordinate his or her professional standards, judgment or objectivity to any unauthorized individual. If significant differences of opinion in professional judgment occur, then they should be referred to program administration or the Corporate Compliance Officer for resolution.

Employees and agents should be honest and forthright in any representations made to people served and their families, vendors, payors, other agents, and the community.

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All reports or other information required to be provided to any federal, state or local government agency shall be accurate, legible, complete, and filed on time.

Center employees and agents must perform their duties in a way that promotes the public's trust in The Center for Discovery.

Respect of Property Rights

The Center for Discovery's assets are to be used only for the benefit of The Center and the people we serve. Assets include funds, equipment, inventory and office supplies, as well as concepts, business plans and strategies, information about people served, financial information, computer property rights, and other intellectual property and business information about The Center. These assets are not to be used for personal gain or given to any other persons or entities, except in the ordinary course of business as part of an approved transaction.

Employees and agents may not use the resources of The Center for Discovery or a program participant for personal or improper purposes or permit others to do so.

All employees and agents must obtain appropriate authorization prior to committing or spending The Center for Discovery's funds.

Center for Discovery information may not be removed from The Center's property without permission from a supervisor or administrator with proper authority over the information.

Employees and agents shall take all reasonable steps to protect computer systems and software from unauthorized access or intrusion. Unauthorized use and / or copying of computer software not contained in the license granted to The Center for Discovery, and installation of unauthorized software on agency computers is prohibited.

If any member of The Center for Discovery community is aware of or has reason to believe that funds or assets are being improperly used, he or she must immediately report this to the appropriate supervisor or the Corporate Compliance Officer.

Conflicts of Interest

The Center for Discovery is committed to clarity of our mission and purposes, free of any appearance of conflict or impropriety. The Center for Discovery will not pursue any business opportunity or take any other action that will require it to engage in illegal or unethical behavior, or is reasonably likely to fall outside of The Center for Discovery's mission, purposes or powers.

All members of The Center for Discovery community will act in a manner consistent with The Center's mission and purposes, and consistent with The Center's reputation for integrity and excellence. All employees and agents of The Center for Discovery will ensure that no activity takes place that in any way jeopardizes the tax exemption, licenses, or governmental authorizations of The Center for Discovery.

All employees and agents of The Center will accomplish their business on behalf of The Center without engaging in any business, professional or personal activity that would create a conflict of

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interest, or an appearance of a conflict of interest, without appropriate disclosure and advance approval by the Board of Directors or the President / Chief Executive Officer or his/her designee.

It is a conflict of interest for Center employees or agents to personally take opportunities that are discovered through the use of Center property, information or position with The Center; to use Center property or information for personal gain; or to compete with The Center for Discovery.

Placing business with any firm in which there is a family relationship may constitute a conflict of interest. Advance disclosure and appropriate approvals are required in such a situation.

Employees or agents should not become involved, directly or indirectly, in outside commercial activities that could improperly influence their actions. For example, an employee or agent should not be an officer, director, manager or consultant of a potential competitor, customer, or supplier of The Center without first disclosing that relationship to management.

Employees and agents must not allow any outside financial interest, or competing personal interest to influence their decisions or actions taken on behalf of The Center.

Employees and agents must avoid any situation where a conflict of interest exists or might appear between their personal interests and those of The Center. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

Board members and certain key employees must complete and sign an annual conflict of interest statement describing any potential conflicts of interest that may arise due to personal, business or family relationships.

Employees and agents should report any potential conflicts of interest concerning themselves, co-workers or family members to management.

Gifts

Employees and agents should not accept or provide benefits that could be seen as creating conflict between their personal interests and The Center's legitimate business interests. This includes accepting meals, gifts, refreshments, transportation, or entertainment provided or received in connection with the job.

Gifts and benefits to clinicians or referral sources are prohibited.

Employees and agents may never accept gifts of any kind from individuals or business entities who are in the process of competitive bidding for a contract with The Center for Discovery, or whose contracts are under review as to whether the contact should be continued.

Employees and agents may not solicit money, gifts, gratitude or any personal benefits of favors of any kind from providers, agents, or people we serve and their families. Individuals, parents or vendors who wish to express their gratitude should be encouraged to make a donation to The Center or to a particular program, or to submit letters of recognition as the appropriate way to recognize an employee for exemplary service.

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Maintenance of Records

Center for Discovery employees and agents must record and report all agency, participant and / or financial information fully, accurately and honestly. Relevant information must not be omitted or concealed. Records include, but are not limited to records of the people we serve, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims payment records, correspondence and any other method of communication. Employees and agents must take every reasonable precaution to ensure that all documentation is accurate, timely, and in compliance with federal and state laws and regulations and Center policies and procedures.

The retention, disposal or destruction of records of or pertaining to The Center for Discovery must always comply with legal and regulatory requirements and Center policy.

Protection of Confidential Information

The Center for Discovery will ensure that all private information owned by others, but in the custody and possession of The Center, be held in confidence and not utilized outside of the use contemplated by the owner of the information without the express permission of the owner.

The Center has developed policies and procedures to assure that the confidentiality of Center information and information about the people served and about the employees is protected and released only with the appropriate authorization or for lawful reasons, in addition to purposes of treatment, payment and operations. All members of The Center for Discovery community are required to comply with The Center's Confidentiality Policy.

General Guidelines for Center employees and agents:

- Treat all of The Center for Discovery's records and information as confidential.
- Do not release confidential information without the proper authorization. Confidential information includes not only information about the people that we serve and their families, but also non-public information about The Center and its employees that may be of use to The Center's competitors or harmful to The Center for Discovery or its customers if released.
- Protect Center for Discovery information and avoid discussing or disclosing Center for Discovery information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside The Center. Furthermore, Center employees and agents may not share confidential information with anyone, except where required for a legitimate business purpose.
- Any questions concerning confidential information or the Confidentiality Policy should be directed to the employee's immediate supervisor or the Corporate Compliance Officer.
- Any confidential information gained from employment with The Center for Discovery cannot be used for an individual's or another company's benefit. No one may take copies of any reports, documents or any other property belonging to The Center.

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- Upon termination of relationship with The Center for Discovery, employees and agents must return all Center property including, but not limited to, copies of documents, notes, and other records containing confidential information; portable electronic devices such as flash drives and cell phones; Agency ID; or keys.

Federal and State Programs

The Center is committed to complying with the laws and regulations that govern the federal and state programs that it administers. Policies and procedures, the Corporate Compliance Program and this Code of Conduct are developed to provide guidance in employees/agents' day-to-day responsibilities. All members of The Center community must abide by the policies and procedures and the standards set by The Center.

Governmental Investigations

There may be times that The Center is asked to cooperate with an investigation by a federal or state governmental agency, or to respond to a request for information. A request may be formally addressed to The Center or an individual within The Center. Any requests for information or cooperation with an investigation must be reported to the Corporate Compliance Officer immediately.

Political Activities and Contributions

Because The Center is a not-for-profit organization, it is prohibited from engaging in any political campaign activities and a lobbying beyond that permitted by law.

Center for Discovery funds and resources, including employee work time, computers, email account etc. may not be used for political contributions or activities.

Employees or agents may not act as a representative of The Center for Discovery in any political campaign activity. Anyone expressing personal political views or support or opposition of a candidate for public office, must be very clear in stating that these views, support or opposition are expressed as an individual and not as a representative of The Center.

Employment Environment

The Center is committed to creating a safe and professional workplace where all members of The Center community and others are treated with respect and without regard to their race, sex, age, religion, national origin, color, marital status, disability, sexual orientation, veterans status or other protected characteristics. Business integrity, teamwork, trust and respect are The Center's most important values. Unlawful discrimination, intimidation, bullying or harassment of any sort violates these values. All Center employees and agents must exhibit and promote respect, integrity, trust and teamwork in the workplace and must comply with this code prohibiting discrimination and harassment in all facets of The Center's work.

Seeking Guidance

The Center for Discovery is committed to ensuring that all members of the Center community are fully informed of the requirements of their respective responsibilities and are provided with initial and ongoing training to enable them to fulfill those responsibilities.

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All members of the Center community will have access to applicable laws, rules, regulations, policies and procedures necessary for them to perform their responsibilities as well as access to this Code of Conduct and the Corporate Compliance program. Employees will be provided with regular training on applicable laws, rules, regulations, policies and procedures and the Corporate Compliance Program to include the expectations outlined in this Code of Conduct. Center employees and agents are instructed and encouraged to seek out guidance from the appropriate supervisor or administrator if they have any questions or require additional direction regarding their specific responsibilities.

Any additional questions regarding compliance or related to the Code of Conduct may be directed to the Corporate Compliance Office at (845) 707-8453 or (845) 707-8276.

Reporting Violations, Corrective Action and/or Discipline

The Center is committed to full and ongoing enforcement of this Code of Conduct and of the standards contained in the Corporate Compliance Program.

All employees and agents of The Center are to report suspected violations of these standards of conduct to their supervisor, an appropriate departmental head, an administrator from People Operations or to the Corporate Compliance Officer. A Corporate Compliance Hotline is also available for confidential reporting of such issues. The Compliance Hotline number is (845)-707-8811, Reports may be made anonymously

The Center ensures that reports of suspected or perceived violations, made in good faith, may be reported without fear of intimidation, reprisal or retaliation, and that confidentiality will be protected within the limits of the law. Reports made to a supervisor, department head, or the Office of People Operations will be promptly relayed to the Corporate Compliance Officer to be investigated and reported to appropriate authorities as indicated. All reports of suspected violations will be fairly, thoroughly and promptly investigated by appropriate individuals, and will be promptly resolved. An Employee or agent may also report his/her concerns about perceived violations of federal and state laws and regulations and/or financial irregularities to appropriate governmental agencies without fear of intimidation, reprisal or retaliation.

The False Claims Act

Under the United States and New York False Claims Acts (the "FCA"), the government and private citizens are entitled to bring lawsuits against organizations or other individuals who defraud the government.

Persons or agencies found to have violated the FCA may be required to pay triple damages done to the government and a fine between \$5,000 and \$11,000 for every false claim. In addition, there can be criminal penalties of up to five years in prison and/or up to a \$10,000 fine. Private citizens who institute an FCA claim must provide to the government all of the information he or she has about the claim. If the government intervenes in the case, the relator may be entitled to a share in the eventual recovery.

The FCA provides protection to shield private citizens from retaliation for starting a qui tam case in good faith.

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Any Center for Discovery employee who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, Center policy, procedure or practice is subject to appropriate disciplinary action. Disciplinary action may range from a warning and retraining to suspension or termination, depending upon the nature of the incident and the relevant surrounding circumstances. Disciplinary actions are fairly and firmly enforced

Conclusion

This Code of Conduct provides general standards and guidance for members of The Center for Discovery community. In the normal course of activities, situations will occur in which Center employees and agents will be expected to apply these standards. If any member of The Center for Discovery community is faced with such a situation and seeks additional guidance, or has any questions or comments about any provisions of this Code or of standards of behavior expected, he or she is encouraged to contact The Center for Discovery People Operations Office or Corporate Compliance Office at any time.

The Code of Conduct is made available as part of the Corporate Compliance plan, policies and procedures which make up the Corporate Compliance Handbook via website (<http://www.thecenterfordiscovery.org/quality-improvement-and-compliance/#CompliancePolicy>) to the public, including all Board members, administration, employees, and those with whom business is conducted. It is also available to employees via a link from the Discovernet Home page

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