

Subject: Code of Conduct
Policy/Procedure No: 6
Department No: 60

Effective Date: 12/01/2015
Prepared By: Director of Finance
Revised Date: 03/08/2018, 12/23

POLICY:

Thornapple Manor (“Facility”) has a reputation for conducting itself in accordance with business and community ethics and in compliance with applicable laws, rules and regulations. Thornapple Manor recognizes the problems that both deliberate and accidental misconduct in the provision of long term care can cause. Thornapple Manor intends to promote full compliance with all legal duties applicable to it, foster and assure ethical conduct and provides guidance to each employee and agent of Thornapple Manor for his/her conduct.

This Code of Conduct contains the Principles underlying the policies of Thornapple Manor. It provides guidance to all individuals providing services to, or on behalf of Thornapple Manor. All employees of Thornapple Manor are required to follow all of the Thornapple Manor policies and procedures. All employees are obligated to incorporate the Code of Conduct into their daily performance. All employees are responsible for ensuring that their behavior and activity are consistent with this Code of Conduct.

PROCEDURE:

The Code of Conduct will be reviewed regularly, updated and distributed as required.

A. Thornapple Manor will strive to ensure that all activity by or on behalf of Thornapple Manor is in compliance with applicable laws.

- ◆ Thornapple Manor shall ensure that all statements, communications and representations of its employees are accurate, complete and truthful and in compliance with applicable laws and regulations.
- ◆ Thornapple Manor employees shall perform their duties in a manner that promotes public trust.
- ◆ Thornapple Manor shall not pursue any business activity that requires engagement in unethical or illegal activity.
- ◆ Thornapple Manor will, to the best of its knowledge and understanding, ensure that all reports or other information required to be provided to any federal, state or local government agency is filed accurately and in conformance with the applicable laws and regulations governing such reports or information.

B. Thornapple Manor is committed to conducting business with high standards of business ethics and integrity.

- ◆ Thornapple Manor will take every reasonable precaution to ensure that its billing and coding are in compliance with relevant policies, federal and state law and regulations.
- ◆ Thornapple Manor will not file a claim containing information known to be false.

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- ◆ Thornapple Manor will ensure that payments and other transactions are properly authorized by management and properly documented in the accounting books and records.
 - ◆ Thornapple Manor will transact business with health care professionals in a fair, ethical and lawful manner.
- C. Thornapple Manor employees, agents and contractors shall demonstrate a commitment to quality. Thornapple Manor employees, agents and contractors shall strive to provide high quality care.**
- ◆ Thornapple Manor shall provide appropriate care based on medical need, without regard to race, religion, national origin, age, sex, sexual orientation, disability, ability to pay, or any classification protected by law.
 - ◆ Thornapple Manor will provide care consistent with its policies and procedures.
 - ◆ Thornapple Manor will respect and maintain the dignity of every resident and strive to provide care in a manner sensitive to cultural differences and individual desires.
 - ◆ Thornapple Manor will encourage employees, agents and contractors to report through the appropriate channels and when possible, correct situations that compromise the provision of quality care.
 - ◆ Thornapple Manor employees, agents and contractors have access to a variety of confidential, sensitive and proprietary information. Unauthorized use of this information could result in a violation of residents' rights and be harmful to Thornapple Manor. Every Thornapple Manor employee, agent and contractor has the obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of this information. .
- D. Thornapple Manor employees owe a duty of loyalty to the organization. Employees, agents and contractors are prohibited from using their position with Thornapple Manor, or knowledge obtained through their position, to profit personally or to assist others in profiting at the expense of Thornapple Manor.**
- ◆ All Thornapple Manor employees, agents and contractors are expected to avoid conflicts of interest, actual impropriety and/or an appearance of impropriety that might arise from the knowledge and/or influence of outside activities on business decisions of Thornapple Manor or from the disclosure or private use of business affairs or plans of Thornapple Manor.
 - ◆ Loans to employees from vendors doing business with Thornapple Manor are prohibited. Loan defined as a thing that is borrowed, to encompass anything borrowed from currency to supplies and equipment. Exception to this would be financial institutions that are vendors of Thornapple Manor, as loans are a normal and primary business activity, however employees who have a personal relation with those financial institutions will not use their relationship with Thornapple Manor for personal gain.

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- ◆ Donations to and sponsorships of Thornapple Manor can be accepted only by the administration of Thornapple Manor.
 - ◆ Individual Thornapple Manor staff shall not accept monetary gifts from residents of the Facility. Individual Thornapple Manor staff may accept nonmonetary gifts not to exceed a value of \$10.00, only if they have received prior approval from Thornapple Manor administration.
 - ◆ Disclosure of proprietary and sensitive information to any unauthorized person or the use of such information for personal benefit is prohibited.
 - ◆ Employees are expected to adhere to proper business practices and federal and state anti-fraud and referral prohibitions in dealing with vendors and referral sources.
 - ◆ Thornapple Manor employees will strive to preserve and protect Thornapple Manor assets by making wise and effective use of Thornapple Manor resources and by accurately reporting its financial condition.
- E. Thornapple Manor employees will promptly notify the Corporate Compliance Officer, Administrator or another appropriate high level officer of any possible violations of law or improper activity by its employees, agents and contractors.**
- ◆ Thornapple Manor employees have an affirmative duty to report problems or concerns.
 - ◆ Employees will make reports in person to the Compliance Officer, by telephone at (269)945-2407 ext. 1013 or by depositing written information in the Corporate Compliance drop box located by the employee entrance.
 - ◆ Thornapple Manor will discipline employees who have knowledge of problems but who do not report these possible violations of law or improper activity.
 - ◆ Thornapple Manor will not directly or indirectly retaliate against an employee or any individual who makes reports regarding possible violations of law or improper activity.

Note: Policies, procedures and protocols are developed to address usual and customary events. No policy, procedure or protocol can cover every possible situation or circumstance. As a result, deviations from this policy may occur based on unique or unusual circumstances.