



Our Code of Conduct and Our Culture of Ethics and Compliance

A Message From Our CEO

One of Georgia Hospice Care's values is to Act with Integrity, an essential part of serving with love, providing comfort and support through compassionate care and meaningful experiences. To be trusted requires us to always be responsible and forthright in our actions and intentions with those we serve and our teammates. Living our Values also builds confidence in, and is the foundation for, the way we do our work. We must be ethical and sincere in all our business dealings, and compliant with all applicable laws of the land. Collectively, these create a strong culture of credibility.

We have created a Code of Conduct to help each of us do the right thing, in the right way, and to strengthen our culture of trust. This guide applies to all of us and is intended to outline the standards of behavior and working relationships we are expected to uphold on a daily basis. It is not a substitute for good judgment, nor does it cover every situation.

It is our commitment to our patients, communities, each other, and the organization to conduct our business with integrity and excellence. Please spend time to understand our Code of Conduct ("Code"). Practicing its principles is the right thing to do for our patients and creates the trust we aspire to in our Mission, Vision, and Values.

Thank you for your continued dedication to our patients and for your commitment to upholding our standards in our Code.

With you,

Troy Yarborough

MISSION

To serve with love, providing comfort and support through compassionate care and meaningful experiences.

VISION

Be recognized as the premier provider of care known for our superior patient-family experience, delivering the highest quality care, and building a culture of excellence.

VALUES

With you

We help the families we serve navigate the health care journey with love and compassion.

Pursue diversity

Commit to incorporating different backgrounds, views, and experiences as advantages to our learning and growth.

Communicate effectively

Communicate clearly and often, engage with authenticity, and choose our words wisely and supportively.

Create positive experiences

Use our resources, talent, and hearts to create meaningful and memorable experiences.

Act with integrity

Always honest and forthright in our actions and intentions with those we serve and our teammates.

Who Must Follow the Code?

All employees who work at Georgia Hospice Care must follow our Code as well as related policies and procedures; this includes the Governing Board of the parent organization and all affiliate Boards, caregivers, medical staff members, contractors, consultants, agents, students, volunteers, and vendors.

Our Code of Ethical Business Conduct

We are true to our mission in pursuit of our vision. We skillfully care for our patients and provide high-quality care in every interaction in accordance with our values.

We sustain a safe and inclusive working environment where everyone's contribution is valued and respected. We strive for a healthy and safe workplace where everyone can contribute and fully utilize their talents.

We ensure patients understand their rights. When we listen to our patients, protect their rights, and preserve their dignity, we honor the trust they have placed in us. We promote patient safety and autonomy in care decisions and treatment choices.

We only access, use, or disclose patient information for appropriate business or treatment reasons. We protect our patients' right to access and use their health information, and we do not interfere with the appropriate use or sharing of health information with providers, family, or other appropriate recipients. We access, use, and/or disclose a patient's medical information only when we have a legitimate business reason for doing so, receive proper authorizations, or as required by law, and we follow our record retention policies and procedures.

We document, code, and bill appropriately, and do our part to prevent and detect fraud, waste, and abuse. Our documentation of business and patient records is clear, complete, and accurate. We do not falsify or improperly alter any document, such as business, employment, or medical records. We also code and submit claims information that is accurate and in compliance with applicable federal health care program and contractual requirements. We report and return any identified overpayments.

We are fair and honest in our dealings with each other, our business partners, and vendors. In these business relationships, everyone has a right to be treated lawfully and in an ethical manner.

We follow our policies to ensure company assets are used for appropriate business purposes. We protect strategic and business operations information from disclosure to others who do not need to know our confidential information, as it may cause harm to the organization.

We are committed to the highest standards of ethics and compliance in everything we do. We know the rules that apply to our individual jobs and comply with all regulatory standards that apply to our business. Patients place their trust in us and we honor that trust with living our Values and Code of Conduct.

We identify and report conflicts of interest, avoid them when we can, and manage the unavoidable ones. We select business partners and vendors on the basis of objective criteria and disclose any potential and actual conflict of interest in a timely manner. We follow the law and our policies and principles of good business ethics pertaining to gifts, entertainment, and business courtesies.

We are honest and ethical in our interactions with physicians and other referral sources. Physicians and other health care providers are often able to refer patients to us. Federal and state laws have specific requirements that we follow to ensure referrals are proper, based on the needs of the patient, and not in return for gifts or special favors. We prohibit paying for referrals or accepting anything of value in exchange for the referrals of patients.

We are responsible for speaking up whenever we believe our values, policies, or the law are being violated or have questions about doing the right thing. If you see or suspect a situation that may be a violation of our values, this Code, our policies, or the law, you must speak up. An issue cannot be addressed if it is not raised.

Our Responsibilities

All of us have a role to play in protecting our company's reputation; doing our part means that we have the following responsibilities:

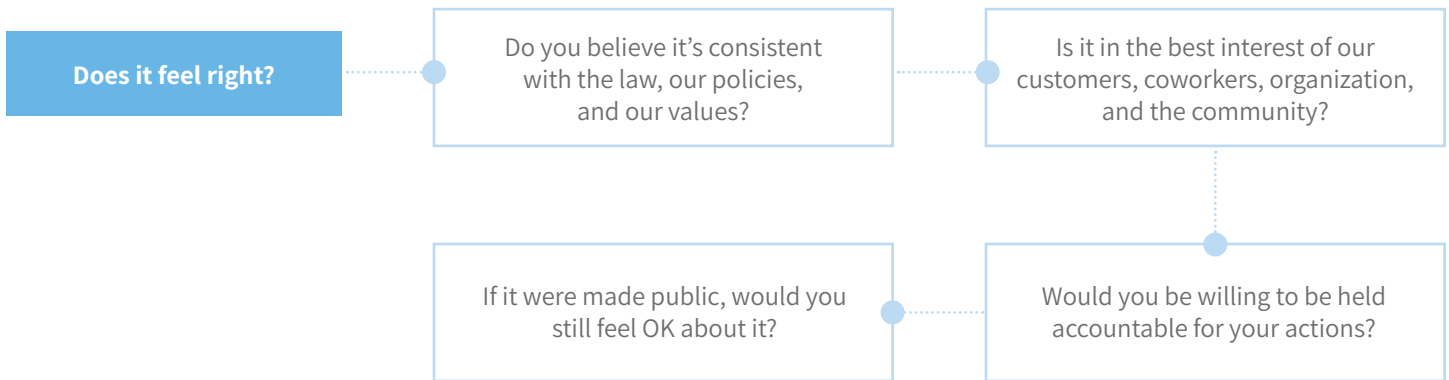
- Be familiar with and follow the information contained in this Code, as well as the Compliance Program, policies, procedures, laws, and regulations that apply to you and your job
- Ask questions and report concerns
- Always act in a professional, honest, and ethical manner
- Licensed professionals employed by Agape Care Group will follow the ethical standards of their respective licensing boards
- Work as a team and treat others respectfully
- Proactively seek to resolve problems
- Cooperate and be truthful when responding to an investigation, inspection, or audit
- Certify that you have read, understood, and follow this Code

Leaders Have Additional Responsibilities

- Set an example for others to follow
- Ensure all employees understand the policies, procedures, laws, and regulations that apply to their work
- Be approachable. Maintain a setting where others feel comfortable asking questions or raising concerns
- Be respectful and provide appropriate and timely responses to questions or concerns
- Assess developing circumstances quickly and accurately, keeping the Compliance Department informed of potential compliance concerns
- Be fair and consistent when enforcing our standards and when holding caregivers accountable
- Never ask or pressure anyone to do something you would feel uncomfortable or are prohibited from doing yourself
- If you supervise third parties, ensure they understand their obligations to this Code and our expectations

Making Good Decisions

Making good decisions is not always easy. At times you will feel under pressure or may be unsure of what to do. When faced with a difficult decision, ask yourself:



- If you answered “yes” to all of these questions, then the decision to move forward is probably OK.
- Not sure? Ask your supervisor or another internal resource for guidance.
- If you answered “no” to any of these questions, stop and seek help. The action could have serious consequences.

How Do I Report A Concern?

- Discuss the issue with someone in your Chain of Command
- Talk to Human Resources or the Compliance Department
- Email the compliance hotline by visiting <https://hospicecare.ethicspoint.com> or by scanning this QR code
- Call the Compliance Hotline at 844-962-1277



Our Compliance Hotline is available 24 hours a day, seven days a week. All contacts are confidential, to the limit allowed by law, so if you prefer, you can make an anonymous report. It is important to provide as much information as possible (e.g., who, what, when, where,) which will help us review the report and investigate any potential Code violation or misconduct.

We support those who raise concerns and never tolerate retaliation. You can be comfortable sharing concerns and asking questions without worrying about retaliation. We take retaliation claims seriously; they will be investigated, and if substantiated, retaliators will be disciplined up to and including termination of employment.