

# Code of Conduct



**Southwestern Health Resources**



**care@care**  
Insurance Company, Inc.

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# Letter from the Chief Compliance Officer

At Southwestern Health Resources (SWHR), we are creating an unparalleled, value-based healthcare experience for providers, patients, community partners, brokers and employers. Our success as one of the nation's leading population health organizations is attributed to employees like you who innovate, solve challenges and design solutions that lead to better care, better outcomes and lower costs.

As you know, our industry is highly regulated, complex and always evolving, which is why SWHR provides employees ongoing training, education and resources. When faced with complex situations or dilemmas, such as patient confidentiality, conflicts of interest or erroneous financial reporting, I trust that you will take the right course of action or seek guidance from our SWHR Code of Conduct.

The SWHR Code of Conduct:

- Reflects our commitment to ethical business behavior
- Provides guidelines for making informed decisions
- Presents an overview of the policies to which we adhere to daily

At SWHR, we are committed to maintaining the highest business standards, which starts with adhering to our values. Please read our Code of Conduct carefully and refer to it when you need to appropriately address issues, concerns or challenges. Our success in ensuring the health of our community depends on us fully understanding the policies and regulatory guidelines that govern our daily actions and decisions.

Thank you for your continued commitment to our mission and goals, and to living our values each day. Working together, we are redesigning the way healthcare is delivered throughout North Texas and improving lives throughout our community.

Sincerely,



Natalie Ramello

Chief Compliance Officer

For more information regarding the Code of Conduct, call the compliance hotline at 1-844-760-5838 or email [SWHRcompliance@southwesternhealth.org](mailto:SWHRcompliance@southwesternhealth.org).

# Purpose

This Code of Conduct has been adopted as an abbreviated guide that explains the standards that should guide employees as they carry out their duties at Southwestern Health Resources Clinically Integrated Network (SWHR). This Code of Conduct applies to employees with SWHR, Care N' Care Insurance Company and the Accountable Care Organization.

The following sections of this Conduct document provide concrete information about various issues that employees with SWHR will encounter, sometimes routinely, and sometimes rarely.

The first section (1.0) addresses the legal and regulatory issues that might be encountered during the course of conducting business. In many of these instances, the standards for employee behavior are dictated by a straightforward set of laws and regulations. Sections 2.0 through 6.0 address issues that may require more subjective judgment by employees.

Section 7.0 addresses the channels employees should use if they believe a violation of any of the rules, regulations or organizational policies have occurred.

We believe having knowledge of these topics will help you perform in a way that helps you and SWHR build a better way to care, together.

## 1.0 Legal and Regulatory Compliance

Healthcare is a highly regulated industry. Even people who have worked in the industry for a very long time may not fully grasp every rule or regulation. This means it is sometimes possible to accidentally cross boundaries that shouldn't be crossed. That's why we have standard policies and procedures, forms and approval pathways for nearly every aspect of our business operations. SWHR invests in training and education for employees so they can function comfortably in their roles, but all employees should familiarize themselves with the laws and regulations that most frequently correlate with their area of the business.

The following subsections provide summary information on a few of the regulations that might impact our business operations and individual employees. Any questions or concerns related to the specific legal or regulatory matters outlined below should be referred to the Compliance Department (see section 7.2 for reporting information).

## 1.1 Medicare Advantage and Drug Plans

The Centers for Medicare & Medicaid Services (CMS) has established specific regulations that govern the business activities of any firm participating in Medicare Advantage or the Medicare Prescription Drug Plan.

These rules apply to all employees (including temporary workers and volunteers), governing body members, consultants, contractors, subcontractors, vendors, agents, and first-tier, downstream and related entities ("FDRs") board members, and their employees. The most pertinent laws relate to those that govern Medicare Parts C and D, and any other guidance provided by CMS or by the U.S. Department of Health and Human Services (HHS). These rules also apply to other parties with which Care N' Care contracts to provide administrative or other services (also known as First Tier, Downstream and Related Entities, or FDRs). FDRs are required to adopt and adhere to this Code of Conduct, or to develop and adhere to their own Code of Conduct, as well as policies and procedures that meet CMS requirements.

## 1.2 Federal False Claims Act

Federal and state laws exist to prevent the submission of false medical reimbursement claims. Nearly every week, news stories report on people and medical facilities that violate these laws. Such violations result in criminal judgments, and they are typically linked with poor or unnecessary medical care. These laws reduce the likelihood of potential fraud, waste and abuse from occurring. Anyone involved with providing or obtaining reimbursement for medical services or accessing supplies or equipment from or on behalf of SWHR, is responsible for submitting honest and accurate claims to Medicare, Medicaid, other health care programs and non-governmental third-party payers.

Employees are expected to report any ethical misconduct immediately to the Chief Compliance Officer or other appropriate internal authorities.

Ignoring a possible violation of the Federal False Claims Act (FCA) will only make matters worse for the people involved and the organization.

As set forth elsewhere in this Code of Conduct, any retaliation against any individual making a report of a potential violation of the False Claims Act is prohibited, thus ensuring that employees can safely report questionable incidences without fear of reprisal.

## 1.3 Antitrust

Violations of federal antitrust laws can result in criminal and civil liability, including triple damages. Civil antitrust actions can be initiated by the U.S. Department of Justice (DOJ), the Federal Trade Commission (FTC) or by a state's attorney general. In addition, private plaintiffs may bring suit against the involved healthcare entities. In healthcare, private plaintiffs might be competitors, other physicians, beneficiaries, suppliers or third-party payers. Antitrust litigation is time-consuming and expensive. Accordingly, all employees must comply with all applicable federal and state antitrust laws that regulate competition.

## 1.4 Anti-Kickback Act

The federal Anti-Kickback Act, or "anti-bribery law," declares that it is illegal to offer or accept "remuneration" (something of value), directly or indirectly, in exchange for the referral of any federal healthcare program's (including Medicare) business. Keep in mind that some activities may fall within certain "Safe Harbors," which are exceptions to the criminal standards and rules. Given this, the Anti-Kickback Act is sometimes subject to misunderstanding. The underlying purpose of this act is to prevent improper influence over provider or supplier choice when furnishing covered items or services. This law is also intended to prevent the over utilization or inappropriate utilization of items or services that may result in higher Medicare or Medicaid program costs and reduced quality of care.

SWHR employees must avoid any actions, such as the giving or receiving of gifts or services, that may give the appearance that the gift or service has been offered in return for potential referrals. Violations of this law can result in monetary fines and imprisonment of up to five (5) years.

## 1.5 Stark (Physician Self-Referral) Law

The federal Stark physician self-referral law generally prohibits a physician from making referrals to another healthcare entity if the physician, or an immediate family member, has a "financial relationship" with the entity.

Violations of the Stark Law can result in significant financial and other penalties to SWHR. Questions or concerns related to the Stark Law, including contracting for services with physicians or other clinical providers, should be referred to the Chief Compliance Officer.

## 1.6 Health, Safety and Environmental Rules

SWHR complies with all applicable health and safety laws and regulations in order to protect our employees and other stakeholders with whom we come into contact.

In addition, SWHR manages and operates its business in a manner that respects the environment and conserves natural resources. Employees must strive to use company and other resources appropriately and efficiently, recycling when possible, and disposing of all waste in accordance with applicable laws and regulations.

## 1.7 Discrimination

SWHR believes that the fair and equitable treatment of employees, beneficiaries and other persons is critical to fulfilling its mission. As such, SWHR does not establish rules or policies that would discriminate or negatively impact individuals based on race, ethnicity, national origin, religion, gender, age, mental or physical disability, sexual orientation, genetic information, disability or any other health status-related factors. Our business policies and procedures are aligned with the human resources rules and regulations set forth by the Department of Health and Human Services.

Additionally, SWHR will comply with Section 1557 of the Patient Protection and Affordable Care Act, Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, Section 508 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, Titles VI and XVI of the Public Health Service Act, and the Genetic Information Nondiscrimination Act of 2008.

## 1.8 Document Retention

Records retention is an important aspect of health care. Accurate and complete records are crucial for the continuity of patient care, appropriate and proper billing, and for compliance with regulatory, tax and financial reporting requirements.

As a healthcare entity, SWHR maintains all records, documents and other evidence of accounting procedures,

as outlined by federal and state laws and regulations, for a minimum of 10 years. Any records involved in litigation or investigations are considered “active” records and must be stored and protected accordingly, even past the 10-year standard, if necessary. In the event of litigation or a governmental investigation, all applicable records must be maintained until the completion of litigation or investigation. At the start of any litigation or governmental investigation, a notice will be issued by the organization’s legal counsel so that employees can properly respond to and safeguard all required documents.

## 1.9 Lobbying/Political Activity

Employees, senior executive officers, directors and board members should not engage in lobbying or political activities while representing SWHR. No individual may make any agreement to contribute any SWHR money, property or services to any political candidate, party, organization, committee or individual. Employees, officers, and board members may personally participate in and contribute to political organizations or campaigns but must do so as individuals and not as representatives of SWHR.

SWHR may have many contacts and dealings with governmental bodies and officials. All such contacts and transactions will be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is absolutely prohibited. Any requests or demands by any governmental representative for any improper benefit should be reported to the Chief Compliance Officer.

## 2.0 Business Ethics

Companies rise and fall sometimes based on their perceived ethical performance in the marketplace. SWHR and its entities are committed to maintaining the highest ethical standards when conducting SWHR business. We know that any lapse in business ethics at an individual level or corporate level will make it harder to succeed in the marketplace.

SWHR is committed to having an ethical business environment, founded on these principles of conduct:

- Treating everyone with dignity and respect
- Abiding by applicable laws, rules, guidelines and procedures
- Behaving honestly and fairly as we interact with all stakeholders
- Communicating truthfully and accurately in all communications
- Using good judgment and high ethical standards in all business dealings
- Safeguarding confidential patient, member, employee health and other private information
- Protecting trade secrets, and competitive and other business information
- Maintaining accurate and timely records
- Striving for mutual respect and trust in work relationships
- Ensuring a safe and healthy work environment
- Avoiding conflicts of interest
- Guarding against theft or misuse of SWHR property and other assets
- Avoiding use of “insider” information for any business activity conducted by or on behalf of SWHR for personal gain, or sharing that knowledge with someone else who may use it for personal gain

SWHR expects that all employees, (including temporary workers and volunteers), governing body members, consultants, contractors, subcontractors, vendors, agents, and first-tier, downstream and related entities (“FDRs”) board members, and their employees will be held to these same standards.

Even with these ideals in place, there will always be circumstances that arise that fall outside of the processes and procedures that we use to get our work done every day. These situations sometimes require people to use their own judgment in order to move a decision or action forward.

One filter you might use in deciding what action to take when a business situation arises that isn't covered by our standard business rules and procedures is to ask how your decision or action will affect the organization's reputation and your reputation in the company. If either answer is negative, then it's worth it to pause and get advice from your manager or the Chief Compliance Officer.

### 3.0 Protected Health Information

A central theme in employee training is that SWHR regularly processes confidential health information, and employees are expected to understand that certain information must not be released without prior patient or enrollee approval.

If a potential PHI breach occurs, immediately report it to the:

SWHR Privacy Officer:

[SWHRcompliancesouthwesternhealth.org](mailto:SWHRcompliancesouthwesternhealth.org)

The following subsections cover the importance of safeguarding protected information, both patient information and employee information.

### 3.1 Confidentiality

Many SWHR employees have access to sensitive, confidential or proprietary information. Federal laws and SWHR policies prohibit unauthorized searches for confidential information and unauthorized use or disclosure of such information, including confidential information contained in employee, beneficiary and patient records. Confidential or proprietary information is to be accessed, used or disclosed only when authorized and only when the information is required to complete the employee's assigned job duties.

As you carry out your job duties at SWHR, you are responsible for accessing the information necessary to perform your role.

- If your job does not require you to access the information, DO NOT access it
- DO NOT access your own medical record

- DO NOT access the information of friends, family, co-workers or associates you to access the information, do NOT access it.
- If access is required for your job responsibilities, speak to your supervisor and/or the Privacy Officer first before accessing the information

### 3.2 Enrollment Information

All SWHR employees have an obligation to conduct themselves in accordance with the principle of maintaining patient confidentiality. Employees are expected to maintain all SWHR beneficiary and enrollee information in accordance with all applicable laws and regulations regarding the protection of confidential information.

### 3.3 Proprietary Information

The information, ideas and intellectual property assets of SWHR are important to the organization's success. Information pertaining to SWHR's competitive position or business strategies, payment and reimbursement information, as well as information relating to negotiations with third parties, must be protected and shared only to parties that have a need to know, based on job responsibilities. Employees are expected to exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights and software, are carefully maintained and managed to preserve and protect their value.

Misappropriation of confidential or proprietary information belonging to another person or entity will not be tolerated. All SWHR employees are responsible for ensuring that they do not copy documents or computer programs in violation of applicable copyright laws or licensing agreements. Employees are not permitted to use confidential business information obtained from competitors in any manner likely to provide an unfair competitive advantage to SWHR.

### 3.4 Personnel Actions/Decisions/Information

Employee salary, benefits and other personal information must be treated as confidential. Personnel files, payroll

information, disciplinary matters and similar information must be maintained in a manner designed to ensure confidentiality, in accordance with applicable laws.

Employees are expected to exercise due diligence to ensure and prevent the release or sharing of such information beyond individuals who may need such information to fulfill their job duties.

## 4.0 Conflicts of Interest

A conflict of interest occurs when an individual is placed in a situation that might compromise objectivity or professional judgment due to the potential of personal gain. Conflicts of interest can arise in the context of business relationships and purchasing decisions, as well as the use or appropriation of SWHR assets. The existence of a conflict of interest can create an appearance of impropriety that can undermine confidence in the employee or SWHR.

All employees are expected to conduct themselves in a manner that avoids actual impropriety or even the "appearance of impropriety." This means individuals should conduct their personal and professional relationships, including interactions with third-party vendors, in a way that assures themselves, SWHR and the community that our business decisions are made with the best interests of the organization in mind and without the slightest implication of wrongdoing.

Employees should not use their positions or confidential information obtained in the course of work for personal gain. Employees should make sure that any outside jobs or positions do not conflict with SWHR work.

To help employees avoid conflicts of interest, SWHR has developed the policies outlined below.

### 4.1 Reporting Outside Financial Interests

SWHR is connected to a dynamic and changing industry. Business relationships that might not constitute a conflict of interest in one period of time might represent a conflict as SWHR develops new business relationships. Employees, executives and directors of the company should report any personal outside financial interests or any interests of an immediate family member that might constitute a conflict of



interest, if such a conflict can be identified or is suspected to exist. Employees, executives and directors should annually review their business linkages to determine if outside financial interests represent a conflict and report these to the Chief Compliance Officer. Furthermore, employees must report outside financial interests if asked directly to do so.

## 4.2 Services for Competitors/Vendors

Employees, executives, directors, officers and committee members are prohibited from:

- Performing work or rendering services for any competitor of SWHR, or for any organization that SWHR does business with or seeks to do business with, outside of the normal course of his/her responsibilities, without prior written approval
- Serving as a director, officer or consultant for one of the above categories of businesses
- Permitting the use of his/her name in any fashion that would create a perception or indication of a business relationship with such an organization

## 4.3 Boards of Directors/Trustees

SWHR supports employee engagement within our community and community organizations, many of which already benefit from the insights and leadership that employees provide as they serve as volunteers across North Texas. However, employees must seek approval from management before accepting board positions, directorships or trustee appointments for any organization. Executive management approval is required prior to serving as a member of the board of any organization whose interests may conflict with those of SWHR. The Chief Compliance Officer will review any such instance and determine whether it represents a legitimate conflict of interest. If it does, the employee will need to resign from the board position or refuse to accept the appointment to the outside board.

## 4.4 Honoraria

With prior approval, employees are encouraged to

participate as faculty and guest speakers for educational programs and functions related to their work products.

If this participation occurs during a paid work period and the employee is representing SWHR, any honoraria (payments) offered to the employee must be turned over to SWHR, at least the portion that exceeds the program/ function expenses. For faculty or speaking activities that take place outside of work, the employee may keep the honoraria. Also, the employee may keep the honoraria related to hobbies or outside work that are not in conflict with the employee's job responsibilities for SWHR.

## 5.0 Business Relationships

SWHR values its relationships with vendors, contractors and other third parties that are essential to our business operations. In the course of working with these outside entities, SWHR employees must avoid soliciting gifts, favors or other improper inducements that would affect SWHR's business in any way.

The standards outlined below are intended to help employees set and keep appropriate relationships with vendors, providers, contractors, third-party payers and government entities. SWHR intends these standards to be construed broadly to avoid even the appearance of improper activity. If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, employees must contact the Chief Compliance Officer.

## 5.1 Gifts and Entertainment

SWHR strives to preserve and protect our reputation at all times. One way we do this is by avoiding the appearance of improper actions or relationships. There may be instances when giving gifts and engaging in entertainment are acceptable. However, all such instances must still comply with the law and with SWHR policies.

SWHR employees must never give monetary or non-monetary gifts, either directly or indirectly, if it might appear to influence business decisions or be

used to obtain or retain business. Monetary gifts may include cash or cash equivalents (e.g., gift cards). There are specific rules about gift giving in government-related business. As a general rule, gifts, cash or cash equivalents are prohibited, so they are simply best avoided.

## 5.2 Contractor Relationships

All business relations with contractors must be conducted at arm's length, both in fact and in appearance and in compliance with SWHR policies and procedures. Personal relationships and business activities with contractor personnel must be disclosed to ensure that the relationships may not be construed by an impartial observer as to be influencing an SWHR employee's performance or duties. Employees are expected to obtain clarification from management on questionable issues that may arise and to comply with SWHR's conflict of interest policy.

## 5.3 Business Inducements

SWHR prohibits employees from seeking to gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting, or receiving any form of bribe or other improper payment (money, services or other things of value) with the expectation of influencing the judgment or decision-making of any purchaser, supplier, customer, government official or other person by a director, officer or employee of SWHR is absolutely prohibited. Any such conduct must be reported immediately to the Chief Compliance Officer.

Appropriate commissions, rebates, discounts and allowances are customary and acceptable business inducements, provided they are approved by SWHR management and are found not to constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to which the original agreement or invoice was made or issued. Such payments should not be made to individual employees or agents of business entities.

Employees may provide gifts, entertainment and meals of nominal value to SWHR customers, current and prospective business partners and other persons when such activities have a legitimate business purpose, are reasonable and consistent with all applicable laws and SWHR policies and are approved by SWHR management.

## 6.0 Protection of Assets

The standards set forth below are intended to guide and articulate expectations as they relate to activities or behaviors that may affect SWHR's financial health.

### 6.1 Internal Controls

SWHR has established control standards and procedures to ensure that assets are protected from damage or theft and used properly, and that financial records and reports related to physical assets are accurate and reliable. All SWHR employees share the responsibility for maintaining and complying with required internal controls. This means that employees should report any potential violations in this area.

### 6.2 Financial Reporting

All financial reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting potentially represents a form of theft, and it is contrary to SWHR policies and may be in violation of state and federal laws.

### 6.3 Personal Use of Corporate Assets

Just as you safeguard your own personal assets and strive to use them for the benefit of your family, SWHR seeks to ensure that the organization's assets are used only to benefit the company. All employees are expected to refrain from accessing SWHR assets for personal use.

All property and business of SWHR must be used and conducted in a manner designed to further SWHR's interests, rather than the personal interest of an individual

employee. Employees are prohibited from the unauthorized use or taking of SWHR equipment, supplies, materials or services. We ask that employees hold to a high standard in this area.

Prior to engaging in any activity on company time that will result in remuneration or payment to the employee, or the use of SWHR equipment, supplies, materials or services for personal or non-work-related purposes, employees should obtain the approval of the appropriate SWHR business unit or management.

## 7.0 Standards/Policies and Procedures

In addition to the standards and requirements described in this Code, each SWHR department or business unit likely has its own set of compliance standards and operational policies and procedures. These operational policies and procedures will be appropriately maintained and will work in concert with applicable federal and state laws and regulations. The department or unit-specific policies and procedures are designed to serve as a resource to enhance an employee's ability to perform his or her associated duties in accordance with SWHR policies and applicable federal and state laws, as well as other requirements.

Failure to abide by the following guidelines violates the SWHR Code of Conduct and potentially state and federal laws.

### 7.1 Reporting and Investigations

SWHR considers adherence to this Code of Conduct to be of paramount importance. Establishing and maintaining a reputation for honest, ethical business practices and appropriate employee behavior is key to SWHR's overall mission. Furthermore, engaging in illegal activity or improper conduct may subject SWHR to severe civil and criminal penalties, including fines and exclusion from Medicare and/or Texas Medicaid participation. Therefore, suspected noncompliance, illegal activity and improper conduct should be immediately reported to the Chief Compliance Officer for a thorough investigation.

Mitigating circumstances can factor into certain business engagements that might otherwise look

suspicious. Whenever something doesn't appear correct, it is better to report the situation, even anonymously, and then allow the proper channels to handle the matter.

### 7.2 Duty to Report

Ensuring compliance with the many laws, rules, regulations and industry standards that govern our business requires teamwork. For this effort to be successful, everyone who is employed by or affiliated with SWHR must work together. SWHR employees and contractors who become aware of any suspected illegal activity or improper conduct should report these activities through appropriate channels, including:

- Your supervisor
- SWHR's Chief Compliance Officer
- Email ([SWHRcompliance@southwesternhealth.org](mailto:SWHRcompliance@southwesternhealth.org))
- Compliance hotline: 1-844-760-5838
- Reporting Link: [Compliance Concerns](#)

Failure to comply with the laws or to report suspected violations of state or federal law can have very serious consequences for SWHR and for any affiliated individual who fails to comply or report. To help people overcome the fear of reporting ethics violations, SWHR has created the safe pathways listed above to report.

### 7.3 Anonymous Reporting

SWHR employees and contractors may report suspected illegal activity or improper conduct anonymously. To the extent permitted by federal and state law, SWHR will take reasonable precautions to maintain the confidentiality of those individuals who report illegal activity or improper conduct, as well as the confidentiality of those individuals involved in the alleged violation, whether or not illegal or improper acts occurred.

## 7.4 Investigations and Duty to Cooperate

It is the policy of SWHR to promptly and thoroughly investigate all reports of illegal activity or improper conduct. Early detection of potential or actual actions related to compliance, ethical conduct or other measurable areas of performance will hopefully enable the organization to take appropriate corrective action before any significant harm can be done to the business or the organization's reputation. Any action or lack of action that prevents, hinders or delays discovery and a full investigation of suspected illegal activity or improper conduct is a violation of the Code, and may be a violation of federal and/or state law.

If SWHR becomes involved in any civil, criminal or federal or state investigation, we anticipate that employees and contractors will fully cooperate as appropriate. It is important, however, for SWHR to protect the legal rights of the company and its personnel. Any governmental inquiries or requests for information or interviews must be promptly referred to the Chief Compliance Officer.

## 7.5 Protection from Retaliation

SWHR ensures that employees and contractors may report or assist in investigations of suspected illegal acts or improper conduct without the threat of reprisal. No retaliation or disciplinary action will be taken or permitted against SWHR employees or contractors if they are involved in good faith reporting of any potential business practice violations.

## 7.6 Disciplinary Action

SWHR employees and contractors who engage in illegal activity or improper conduct, including violation of this Code or any other SWHR policy, are subject to disciplinary action, including oral or written warnings, reprimands, suspension, termination, financial penalties and reporting of conduct to law enforcement, if warranted. When employees or contractors self-report their own illegal actions or improper conduct, SWHR will take such self-reporting into account in determining appropriate disciplinary action. The severity and frequency of the violation will also be taken into account.

<b>Title:</b>	Code of Conduct	<b>Reviewed and Approved:</b>	06/26/2024
<b>Business Owners:</b>	Corporate Compliance	<b>Created By:</b>	Corporate Compliance
<b>Effective Date:</b>	09/01/2019		
<b>Applies to:</b>	All SWHR employees, (including temporary workers and volunteers), governing body members, consultants, contractors, subcontractors, vendors, agents, and first-tier, downstream and related entities (“FDRs”) board members, and their employees		

### Application of this Code of Conduct

SWHR will provide the Code of Conduct document within 90 days of hire and annually thereafter to all employees, (including temporary workers and volunteers), governing body members, consultants, contractors, subcontractors, vendors, agents, and first-tier, downstream and related entities (“FDRs”) board members, and their employees. . The Code of Conduct is also distributed to all directors, officers and board members at the time of their appointment and annually thereafter.

Within ninety (90) days of employment or execution of a new contract, as applicable, SWHR will circulate to any new director, officer, employee, related entity, contractor or subcontractor a copy of this Code of Conduct.

SWHR expects each person to whom this Code of Conduct applies to abide by the principles set forth above, and to conduct the business and affairs of SWHR in a manner consistent with the general statement of principles of the Code of Conduct.

### Acknowledgment of Code of Conduct

By signing below, I acknowledge that I have read, understand and will abide by the SWHR Code of Conduct. I understand that adherence to the Code of Conduct is a requirement of my employment and/or appointment, and failure to adhere to the Code of Conduct may result in disciplinary action, up to and including termination of employment, appointment, contract and/or affiliation. I understand that it is my obligation to comply with the law, this Code and all applicable SWHR policies and/or contractual obligations.

#### SWHR Employee, Board Member, Contractor, Committee Member:

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_