

Code of Conduct

Principle	Standard
<p>Mission, Vision, and Values Mission Hospice & Home Care is committed to its Mission, Vision and Values.</p>	<p>Mission Mission Hospice & Home Care honors and supports people’s wishes for the last phase of life by providing our community with exceptional end-of-life care and education.</p> <p>Vision We envision a community in which death and dying are recognized as a natural part of life, and everyone is treated with compassion and respect.</p> <p>Core Values Heart, Presence, Courage, Partnership & Joy</p>
<p>Compliance with Applicable Law Mission Hospice & Home Care is committed to conducting all activities and operations in compliance with applicable law.</p>	<p>Transparent, Legal and Ethical Business Conduct Mission Hospice & Home Care is committed to conducting its business with integrity, honesty and fairness and in compliance with all laws and regulations that apply to operations. Mission Hospice & Home Care depends on its board members, employees, volunteers and those who do business with it, to help fulfill this commitment.</p> <p>Obeying Applicable Law Board members, employees, volunteers and contractors shall not lie, steal, cheat or violate any applicable law in connection with their employment and/or engagement with Mission Hospice & Home Care.</p> <p>Fraud, Waste & Abuse (FWA) Mission Hospice & Home Care shall refrain from conduct which would violate any applicable federal or state fraud, waste and abuse laws. Mission Hospice & Home Care is committed to the detection, prevention and reporting of fraud, waste and abuse. Mission Hospice & Home Care is also responsible for ensuring that board members, employees, volunteers and contractors receive appropriate fraud, waste, and abuse training as described in regulatory guidance. Mission Hospice & Home Care’s Compliance Plan, Code of Conduct, policies, and educational activities discuss board member, employee, volunteer and contractor obligations and potential sanctions arising from relevant federal and state FWA laws. Mission Hospice & Home Care expects and requires that its board members, employees, volunteers and contractors not participate in any conduct that may violate the FWA laws including federal and state anti-kickback laws, false claims acts, and civil monetary penalty laws.</p> <p>Political Activities Mission Hospice & Home Care’s political participation is limited by law. Mission Hospice & Home Care funds, property and resources are not to be used to contribute to political campaigns, political parties and/or organizations. Board members, employees, volunteers and contractors may participate in the political process on their own time and at their own expense but shall not represent or give the impression that they are speaking on behalf of or representing Mission Hospice & Home Care in these activities.</p> <p>Anti-Trust All board members, employees, volunteers and contractors must comply with applicable antitrust, unfair competition and similar laws, which regulate competition. Such persons shall seek advice from the Compliance department if they encounter any business decisions involving a risk of violation of antitrust laws. The types of activities that potentially implicate antitrust laws include, without limitation, agreements to fix prices, bid rigging and related activities; boycotts, certain exclusive dealings and price discrimination agreements; unfair trade practices; sales or purchases conditioned on reciprocal purchases or sales; and discussion of factors determinative of prices at trade association meetings.</p>

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<p>Patient Rights Mission Hospice & Home Care is committed to meeting the health care needs of its patients by providing access to quality health care services.</p>	<p>Patient Choice, Access to Health Care Services, Continuity of Care Employees and contractors shall comply with Mission Hospice & Home Care policies and procedures and applicable law governing patient choice, access to health care services and continuity of patient care. Employees and contractors shall comply with all requirements for coordination of medical and support services for persons with special needs.</p> <p>Cultural and Linguistic Services Mission Hospice & Home Care and contractors shall provide culturally, linguistically and sensory appropriate services to Mission Hospice & Home Care patients to ensure effective communication regarding diagnosis, medical history and treatment, and health education.</p> <p>Disabled Access Mission Hospice & Home Care's facilities shall adhere to the requirements of Title III of the Americans with Disabilities Act of 1990 by providing access for the disabled in accordance with applicable law.</p> <p>Grievance and Appeals Processes Mission Hospice & Home Care, its associated physician group, and its contractors shall ensure that Mission Hospice & Home Care patients are informed of their grievance and appeal rights including the Patient/Family Handbook, external Hot Line, through its website and other communications in accordance with Mission Hospice & Home Care policies and procedures and applicable law. Mission Hospice & Home Care shall address, investigate, and resolve Mission Hospice & Home Care patient complaints and grievances in a prompt and nondiscriminatory manner in accordance with Mission Hospice & Home Care policies and applicable law.</p>
<p>Business Ethics In furtherance of Mission Hospice & Home Care's commitment to the highest standards of business ethics, employees, volunteers and contractors shall accurately and honestly represent Mission Hospice & Home Care and shall not engage in any activity or scheme intended to defraud anyone of money, property, or honest services.</p>	<p>Candor and Honesty Mission Hospice & Home Care requires candor and honesty from individuals in the performance of their responsibilities and in communications including communications with Mission Hospice & Home Care's Board of Directors, supervisory employees, attorneys, and auditors. No board member, employee, volunteer or contractor shall make false or misleading statements to any patients and/or persons or entities doing business with Mission Hospice & Home Care or about products or services of Mission Hospice & Home Care.</p> <p>Financial and Data Reporting All financial reports, accounting records, research reports, expense accounts, data submissions, attestations, timesheets and other documents must accurately and clearly represent the relevant facts and the true nature of a transaction. Mission Hospice & Home Care maintains a system of internal controls to ensure that all transactions are executed in accordance with management's authorization and recorded in a proper manner to maintain accountability of the agency's assets. Improper or fraudulent accounting documentation or financial reporting or false submissions is contrary to the policy of Mission Hospice & Home Care and may be in violation of applicable law and regulatory obligations.</p> <p>Regulatory Agencies and Accrediting Bodies Mission Hospice & Home Care will deal with all regulatory agencies and accrediting bodies in a direct, open and honest manner. Employees and contractors shall not take any action with regulatory agencies and accrediting bodies that is false or misleading.</p>
<p>Confidentiality Board members, patients, employees, and contractors shall maintain the confidentiality of all confidential information in accordance with applicable law and shall not disclose such confidential information except as specifically authorized by Mission Hospice & Home Care policies, procedures, and applicable law.</p>	<p>No Personal Benefit Board members, employees, volunteers and contractors shall not use confidential or proprietary information belonging to Mission Hospice & Home Care to the detriment of Mission Hospice & Home Care, for their own personal benefit or for the benefit of any other person or entity.</p>

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<p>(Continued) Confidentiality</p>	<p>Duty to Safeguard Patient Confidential Information Mission Hospice & Home Care recognizes the importance of its patients' right to confidentiality and implements policies and procedures to ensure its patients' confidentiality rights and the protection of medical and other confidential information. Board members, employees, volunteers and contractors shall safeguard Mission Hospice & Home Care patient identity, eligibility, social security, medical information and other confidential information in accordance with applicable laws including the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act) and implementing regulations, the California Security Breach Notification Law, the California Confidentiality of Medical Information Act, other applicable federal and state privacy laws and Mission Hospice & Home Care policies and procedures.</p> <p>Personnel Files Personal information contained in employee personnel files shall be maintained in a manner designed to ensure confidentiality in accordance with applicable law.</p> <p>Proprietary Information Mission Hospice & Home Care shall safeguard confidential proprietary information including, without limitation, contractor information and proprietary computer software, in accordance with and, to the extent required by, contract or applicable law. Mission Hospice & Home Care shall also safeguard provider identification numbers including, without limitation, Medi-Cal license, Medicare numbers, social security numbers, and other identifying numbers.</p>
<p>Business Relationships Business transactions with vendors, contractors, and other third parties shall be conducted at arm's length in fact and in appearance, transacted free from improper inducements and in accordance with applicable law and ethical standards.</p>	<p>Business Inducements Board members, employees, volunteers and contractors shall not seek to gain advantage through improper use of payments, business courtesies, kickbacks, rebates or other inducements in exchange for referral of services or the generation of other business. Offering, giving, soliciting, or receiving any form of bribe, inducement, kickback, rebate or other improper payment is prohibited. Board members, employees, volunteers and contractors and providers shall not use their positions to personally profit or assist others in profiting in any way at the expense of federal and/or state health care programs, The Hospice or Mission Hospice & Home Care patients.</p> <p>Mission Hospice & Home Care shall take all actions necessary to ensure compliance with applicable federal and state anti-kickback laws regarding the acceptance or payment of any remuneration for the inducement of referrals of services or the generation of other business, and shall comply with all applicable regulations regarding self-referrals and kickbacks.</p> <p>Gifts to Mission Hospice & Home Care Board members, employees, volunteers and contractors are specifically prohibited from soliciting and accepting personal gratuities, gifts, favors, services, entertainment or any other things of value from any person or entity that furnishes items or services used, or that may be used, in Mission Hospice & Home Care and its programs unless specifically permitted under Mission Hospice & Home Care policies. Employees may not accept cash or cash equivalents. Perishable or consumable gifts given to a department or group are not subject to any specific limitation and business meetings at which a meal is served is not considered a prohibited business courtesy.</p> <p>Provision of Gifts by Mission Hospice & Home Care Employees may provide gifts, entertainment or meals of nominal value to Mission Hospice & Home Care's current and prospective business partners and other persons when such activities have a legitimate business purpose, are reasonable, and are otherwise consistent with applicable law and Mission Hospice & Home Care policies on this subject. In addition to complying with statutory and regulatory requirements, it is critical to avoid the appearance of impropriety when giving gifts to persons and entities that do business or are seeking to do business with Mission Hospice & Home Care.</p>

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<p>(Continued) Business Relationships</p>	<p>Third-Party Sponsored Events Mission Hospice & Home Care's joint participation in contractor, vendor or other third-party sponsored events, educational programs and workshops is subject to compliance with applicable law including gift of public fund requirements and fraud and abuse prohibitions, and must be approved in accordance with Mission Hospice & Home Care policies on this subject. In no event, shall Mission Hospice & Home Care participate in any joint contractor, vendor, or third party sponsored event where the intent of the other participant is to improperly influence or induce referrals or gain unfair advantage from Mission Hospice & Home Care or its operations. Employee attendance at contractor, vendor or other third-party sponsored events, educational programs and workshops is generally permitted where there is a legitimate business purpose, but is subject to prior approval in accordance with Mission Hospice & Home Care policies.</p> <p>Provision of Gifts to Government Agencies Board members, employees, volunteers and contractors shall not offer or provide any money, gifts or other things of value to any government entity or its representatives, except campaign contributions to elected officials in accordance with applicable campaign contribution laws.</p> <p>Broad Application of Standards Mission Hospice & Home Care intends that these standards be construed broadly to avoid the appearance of improper activity.</p>
<p>Conflicts of Interest Board members, employees and volunteers owe a duty of undivided and unqualified loyalty to Mission Hospice & Home Care.</p>	<p>Conflicts of Interest Employees, volunteers and board members shall comply with the requirements of Mission Hospice & Home Care Conflicts of Interest policy and applicable law. Board members, employees and volunteers are expected to act in the best interest of Mission Hospice & Home Care. They are expected to use good judgment, to adhere to high ethical standards, and to avoid situations that create an actual or potential conflict between their personal interests and the legitimate business interests of Mission Hospice & Home Care.</p> <p>Outside Services and Interests Without the prior written approval of the Chief Executive Officer, no employee shall (1) perform work or render services for any contractor, association of contractors, a current or previous patient or other organizations with which Mission Hospice & Home Care does business or which seek to do business with Mission Hospice & Home Care; (2) be a director, officer, or consultant of any contractor or association of contractors; or (3) permit his or her name to be used in any fashion that would tend to indicate a business connection with any contractor or association of contractors. Employees are prohibited from obtaining personal work contracts with current patients.</p> <p>Board members and members of the senior leadership team shall notify the Chief Strategy Officer or Chief Compliance Officer of any outside services, activities, positions or speaking engagements that may directly or indirectly relate to Mission Hospice & Home Care, its policies and/or services.</p>
<p>Unlawful Harassment, Discrimination and Retaliation Mission Hospice & Home Care acknowledges that fair and equitable treatment of employees, patients, providers, and other persons is fundamental to fulfilling its mission and goals.</p>	<p>No Unlawful Harassment, Discrimination or Retaliation Mission Hospice & Home Care is committed to complying with applicable law prohibiting the unlawful harassment, discrimination and retaliation, including but not limited to, Title VI of the Civil Rights Act of 1964. Board members, employees, volunteers and contractors shall not unlawfully discriminate, harass or retaliate on the basis of race, color, religion, national origin, age, gender, sexual orientation, physical or mental disability or any other classification protected by applicable law. Mission Hospice & Home Care is committed to providing a work environment free from unlawful discrimination, harassment and retaliation based on any classification noted above or under applicable law.</p>

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<p>Participation Status Mission Hospice & Home Care requires that board members, employees, volunteers, contractors, providers and suppliers meet applicable government requirements for participation in Mission Hospice & Home Care's programs.</p>	<p>Federal and State Health Care Program Participation Status. Mission Hospice & Home Care shall not employ, retain or contract with any person or entity that is debarred or excluded from any federal or state funded healthcare program. Board members, employees, members of the affiliated medical group and contractors shall not be currently suspended, terminated, debarred, or otherwise ineligible to participate in any federal or state health care program, including the Medi-Cal program and Medicare programs.</p> <p>Mission Hospice & Home Care Screening Mission Hospice & Home Care will monitor the exclusion status of employees, individuals and entities doing business with Mission Hospice & Home Care, by conducting regular exclusion screening reviews, including pre-employment, in accordance with Mission Hospice & Home Care policies.</p> <p>Disclosure of Participation Status Board members, employees and contractors shall disclose to Mission Hospice & Home Care whether they are or have been suspended, terminated, debarred, or otherwise ineligible to participate in any federal and/or state health care program. Employees, individuals and entities that do business with Mission Hospice & Home Care shall disclose to Mission Hospice & Home Care any pending investigation, disciplinary action or other matter that could potentially result in their exclusion from participation in any federal or state health care program.</p> <p>Licensure Mission Hospice & Home Care requires that all employees, contractors, health networks, participating providers and suppliers who are required to be licensed, credentialed, certified and/or registered in order to furnish items or services to Mission Hospice & Home Care and its patients have valid and current licensure, credentials, certification and/or registration as applicable. Employees, contractors and entities that do business with Mission Hospice & Home Care shall disclose to Mission Hospice & Home Care any pending investigation, disciplinary action or other matter that could potentially result in their loss of license, credentials or certification.</p>
<p>Government Inquiries/Legal Disputes Employees shall notify Mission Hospice & Home Care upon receipt of government inquiries and shall not destroy or alter documents in response to a government request for documents or information.</p>	<p>Notification of Government Inquiry Employees shall notify the Chief Executive Officer, Chief Strategy Officer, Department of Compliance and/or their supervisor immediately upon the receipt (at work or at home) of an inquiry, subpoena or other agency or government request for information regarding Mission Hospice & Home Care.</p> <p>No Destruction of Documents Employees and volunteers shall not destroy or alter Mission Hospice & Home Care information or documents in anticipation of, or in response to, a request for documents by any governmental agency or from a court of competent jurisdiction.</p> <p>Preservation of Documents Including Electronically Stored Information Board members, employees and volunteers shall comply with all obligations to preserve documents, data, and records, including electronically stored information, in accordance with Mission Hospice & Home Care policies and shall comply with instructions on preservation of information and prohibitions on destruction of information issued by legal counsel.</p>
<p>External Communications Board members, employees, volunteers and contractors may be contacted by outside sources regarding Mission Hospice & Home Care. To avoid providing inaccurate or incomplete information to such outside sources, board members, employees, volunteers and contractors who are asked to speak for or on behalf of Mission Hospice & Home Care should immediately contact the appropriate representative for Mission Hospice & Home Care.</p>	<p>Media Contact Mission Hospice & Home Care will respond to media inquiries in a timely and professional manner only through its designated spokesperson. If any board member, employee, volunteer or contractor is contacted by a representative from any media organization (such as television, radio or newspaper reporters) to speak for or on behalf of Mission Hospice & Home Care, such individual should notify the media representative that he or she is not authorized to make a public comment on behalf of Mission Hospice & Home Care and immediately refer the media representative to the Hospice's Communications Department.</p>

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<p>(Continued) External Communications</p>	<p>Outside Inquiring Parties (Non-Government) If any board member, employee, volunteer or contractor is contacted by an outside inquiring party (non-government) regarding Mission Hospice & Home Care's business, including information regarding current or former employees, Mission Hospice & Home Care projects, or other workplace issues, such individual should inform the inquiring party that he or she is not authorized to speak on behalf of Mission Hospice & Home Care and immediately obtain the inquiring party's name and telephone number. The inquiring party's name and telephone number should then be provided to the Hospice's Media Relations Department. Nothing in this policy restricts an employee from discussing his or her wages or other terms and conditions of employment with coworkers or others, to the extent protected by applicable law.</p>
<p>Compliance Program Reporting Board members, employees, volunteers and contractors have a duty to comply with Mission Hospice & Home Care's Compliance Program and such duty shall be a condition of their respective appointment, employment, or engagement.</p>	<p>Reporting Requirements All board members, employees, volunteers and contractors are expected and required to promptly report suspected violations of any statute, regulation or guideline applicable to federal and/or state health care programs or of Mission Hospice & Home Care's own policies in accordance with Mission Hospice & Home Care's reporting policies and its Compliance Plan. Such reports may be made to a supervisor, the Chief Executive Officer, or the Compliance Department. Reports can also be made to Mission Hospice & Home Care's hotline number below. Persons making reports to the hotline can do so on an anonymous basis. Compliance and Ethics Hotline: Phone 855-498-0749 or email MissionHotline@GetInTouch.com or visit www.InTouchWebsite.com/Mission</p> <p>Disciplinary Action Failure to comply with the Compliance Program, including the Code of Conduct, policies and/or applicable statutes, regulations and guidelines may lead to disciplinary action. Discipline for failure to abide by the Code of Conduct may, in Mission Hospice & Home Care's discretion, range from oral correction to termination of employment in accordance with Mission Hospice & Home Care's policies. In addition, failure to comply may result in the imposition of civil, criminal or administrative fines on the individual or entity and Mission Hospice & Home Care or exclusion from participation in Federal and/or State health care programs.</p> <p>Training and Education Mission Hospice & Home Care provides training and education to board members, employees, and volunteers. Timely completion of compliance and HIPAA training is mandatory for all employees and volunteers of Mission Hospice & Home Care.</p> <p>No-Retaliation Policy Mission Hospice & Home Care prohibits retaliation against any individual who reports in good faith discrimination, harassment, retaliation or compliance concerns or who participates in an investigation of such reports. Employees involved in any retaliatory acts may be subject to discipline, up to and including termination of employment.</p> <p>Referrals of FWA to Government Agencies Upon certain events, Mission Hospice & Home Care is obligated to coordinate compliance activities with federal and state regulators. Employees shall comply with Mission Hospice & Home Care policies related to FWA referral requirements to federal and state regulators, Medicare Administrative Contractors and/or delegated program integrity contractors and law enforcement agencies.</p> <p>Certification All board members, employees, volunteers and contractors are required to certify, in writing, that they have received, read, understand and will abide by the Code of Conduct and applicable policies.</p>