



One McGregor Code of Conduct

At McGregor and McGregor PACE (collectively, “One McGregor”) we are committed to providing the highest standard of care to those we serve. As part of this commitment, we must consistently demonstrate acting with absolute integrity in the way we do our work, conduct our business, interact with one another, and live our lives both in and outside of the workplace. This Code of Conduct (the “Code”) is part of our overall program of corporate compliance and provides guidance to ensure that our work is done in a professional, ethical, and law-abiding manner. It emphasizes the shared common goals and values which guide our choices and actions, and it contains resources to help resolve any questions or concerns about appropriate conduct in the workplace. Please review this document thoroughly, your adherence to its spirit and its specific provisions is critical to upholding and maintaining the One McGregor mission. If you have questions regarding this Code or encounter any situation which you believe violates any provision of this Code, you should contact the Compliance Officer immediately. You have our personal assurance that no retaliation or retribution will result from asking questions or raising concerns about the Code or for reporting potential or suspected improper conduct. We are committed to the values and principles outlined in this Code of Conduct; we are each responsible for, and committed to, ensuring that our actions consistently reflect this commitment. In this spirit, we want One McGregor to be a team of individuals with shared values, and we expect the actions of all to reflect the high standards set forth in this Code of Conduct. We thank you for joining us in our commitment to uphold and adhere to these standards and guidelines and to consistently maintain a positive reflection on the values and reputation of One McGregor.

Leadership Responsibilities

While we are each individually responsible for adhering to and upholding our Code of Conduct, we expect our Administration and Management team to be active participants in creating and facilitating a culture of compliance that promotes only the highest standards of ethics and quality in care. We expect our leadership to be, in every respect, a model of acting with integrity.

Core Principles

Business Ethics: At One McGregor we ensure that our practices comply with all applicable federal and state laws, regulations, and policies. Through the Code of Conduct, we communicate our ethical standards to those we do business with and the general public.

Integrity: At One McGregor we value the integrity of our employees and organization and work together to ensure that everyone acts in accordance with our Code of Conduct.

Resident/Participant-Centered Care: At One McGregor we are committed to providing care focused on the individual needs and personal values of our residents and PACE Participants and we consistently work to provide the highest level of quality care and to ensure that the values of our residents and Participants guide all clinical decision making.



Resident/Participant Safety: At One McGregor we are committed to minimizing the risk of harm to our residents and Participants as a result of the care that is intended to help them. We implement national initiatives promoting safety and maintain a resident/Participant safety program.

Diversity: At One McGregor we provide a workplace environment and care that does not waver in quality because of personal characteristics such as age, race, gender identity, ethnicity, geographic location, socio-economic status, religious affiliation, sexual orientation, or any perceived disability.

Efficiency: At One McGregor we avoid waste, including waste of equipment, supplies, ideas, and energy.

We are committed to being available for all of our PACE Participants, residents, family members and loved ones, employees, volunteers, and physicians. The Compliance Officer can be reached at any time at (216) 337-4893 or (216) 268-8402; all correspondence will remain confidential. You may also contact the DHHS OIG confidential hotline at 1-800-HHS-TIPS (447-8477) to report suspected Fraud, Waste, and Abuse or other suspected incidences of regulatory non-compliance.

Business Ethics

Employee Training

One McGregor provides training and information to all employees about this Code, this organization's policies, and related laws and regulations on an annual basis and as needed.

Non-Retaliation

Any individual who, in good faith, reports suspected wrongdoing will be protected from retaliation.

Compliance with Laws

All activity carried out by, or on behalf of One McGregor is required to comply with all applicable Federal, State, and Local laws and regulations.

Confidentiality

One McGregor is obligated to maintain the confidentiality of residents, personnel, and proprietary information. Confidential information can be accessed only for legitimate business purposes.

Privacy

At One McGregor we are committed to protecting private health information and preventing unauthorized disclosures in accordance with HIPAA and HITECH. We do not



discuss patient information with others who do not have a job-related need to know, including co-workers, colleagues, contractors, volunteers, family, and friends.

Prohibition on Discrimination and Harassment

One McGregor is committed to providing a work environment in which all individuals are treated with respect and dignity. It is the policy of One McGregor to ensure that the work environment is free from discrimination and harassment.

Conflict of Interest

This Code requires you to refrain from performing duties where it would appear to be a conflict of interest. You must avoid situations in which your personal interests could conflict, or reasonably appear to conflict, with the interests of One McGregor.

Anti-Kickback Statute

One McGregor prohibits its service providers from offering, paying, asking for, or accepting any money or other benefits in exchange for resident referrals, purchases, leases, or orders. One McGregor carefully reviews all financial relationships with physicians and other healthcare practitioners for compliance with the Anti-Kickback Statute, the Stark Law, and all other applicable Federal, State, and Local laws and regulations.

Ethics

One McGregor expects honesty and integrity in all aspects of our work. This Code cannot cover all circumstances or anticipate every situation. If you encounter a situation not addressed specifically by this Code, call the compliance hotline at (216) 337-4893 or (216) 268-8402.

Integrity

Substance Abuse

We maintain a zero-tolerance policy to being on our campus while under the influence of alcohol or other substances.

Conflict of Interest

We are committed to ensuring that all residents and PACE Participants receive the highest quality of care. We are further committed to ensuring that no person in a position of caregiving abuses that power to unjustly enrich themselves or recommends alternative treatments for reasons other than that treatment being the best option available. As such, if you believe that a conflict of interest has or will arise in any capacity, please contact our compliance hotline.

Resident-Centered Care

Dignity



We respect all residents' dignity and treat residents with consideration, courtesy, and respect.

Treatment

We provide appropriate treatment and services based upon a comprehensive assessment and plan of care that addresses each resident's clinical conditions.

Resident/Participant Safety

Compliance with Laws

Employees and other healthcare providers are expected to comply with laws designed to improve workplace safety, such as properly controlling and monitoring dangerous materials and maintaining safe equipment.

Documentation

All resident and PACE Participant safety--related events must be documented and reported to the appropriate supervisor. An incident report must be completed and submitted to the Administrator, or designee, for review to improve processes and promote safety for all residents and PACE Participants.

Diversity & Inclusion

Diversity

We are committed to forging an equitable future for all residents, PACE Participants, providers, and employees. We do not discriminate against individuals based on their race, religion, gender identity, sexual orientation, pregnancy, marital status, age, nationality, ethnicity, ancestry, disability, or military status.

Community Engagement

Diversity, inclusion, and anti-discrimination are virtues that we expect our employees to apply to their everyday life, both inside and outside of our campuses. Therefore, we encourage all employees to report violations that occur both on and off One McGregor property.

Discrimination and Harassment

We are committed to maintaining an environment that is free of unlawful discrimination, harassment, and intimidation. Additionally, we are committed to maintaining an environment that is free of sexual discrimination and harassment. Any employee who has actual knowledge or suspicion of such treatment within our workplace is encouraged to report such violations. Any reports we receive will remain confidential and the reporting employee will be protected from retaliation for reporting a violation.

Violence in the Workplace



One McGregor maintains a zero-tolerance policy for verbal and non-verbal threats, threatening behavior, or other acts of violence in the workplace. Incendiary speech or actions that could incite violence are prohibited; an actual incidence of violence is not necessary for a violation to occur.

Efficiency

Fraud Waste and Abuse

We do not permit practices that result in unnecessary costs including submitting false claims and/or unnecessary treatments. One McGregor meets recognized standards of care in compliance with Medicaid, the Federal False Claims Act, and State fraud and abuse prevention laws. If you know of or suspect this activity, contact the compliance hotline.

Purpose

McGregor, at all campuses, is committed to conducting its business with the highest standards of professionalism, integrity, ethics, and personal responsibility. McGregor aims to increase the quality of resident/participant care and safety, reduce abuse and fraud, promote diversity in the workplace, and provide a work environment free from discrimination. The McGregor Code of Conduct is an essential part of its compliance program, under which all the McGregor campuses must operate. The Code of Conduct applies to all individuals and entities providing services on behalf of McGregor. Individuals include all doctors, nurses, teachers, students, volunteers, custodial workers, and anyone else who is on the McGregor campus providing services on behalf of McGregor. Violations of the responsibilities outlined in this Code of Conduct can lead to disciplinary action.

Integrity In Patient Care

Rights and Responsibilities in Resident and Participant Care

We:

- Treat all of our residents and Participants with respect, dignity, and compassion.
- Provide care to our residents and Participants only when it is (1) necessary; and (2) appropriate.
- Provide our residents with care based strictly on identified individual resident and Participant need and without regard for Participant, resident, and/or organizational economic need or advancement.
- Provide our residents and Participants active involvement in all aspects of their care.
- Provide all residents, Participants and/or their legal representatives with a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, and an explanation of the risks and benefits associated with available treatment options.
- Provide equality in care without regard to race, religion, sex, age, national origin, ethnicity, sexual orientation, gender identity, disability, military status, socio-economic status, or other non-work-related personal traits or characteristics.



- Provide all residents, Participants, and applicable legal representatives with appropriate space, confidentiality, privacy, and opportunity for resolution of complaints or grievances.
- Provide our residents and Participants with care in a manner that preserves their dignity and autonomy, promotes self-esteem, respects their personal values, beliefs, and preferences, and protects their legal, civil, human, and Resident/Participant Rights.
- Provide all direct-care providers, employees, outside contractors, and all others acting with, for, under, or on behalf of One McGregor education and training on Resident/Participant Rights to ensure that they are able to make appropriate decisions in this area.

Resident and Participant Personal and Protected Information

We collect information from all our residents and Participants, this includes, but is not limited to personal, demographic, medical, and financial information, as well as medical histories and other information. We obtain this information to ensure that we are providing only the highest quality of care in a manner that is individualized and tailored to the particular needs of each One McGregor Resident/Participant.

We acknowledge and understand the sensitive nature of this information and we are committed to consistently maintaining the confidentiality of all Resident/Participant information in accordance with applicable state and federal laws, and all other rules, regulations, and regulatory guidance provided on this matter.

We do not release or discuss Resident/Participant-specific information with others unless it is necessary for the purposes of providing care, required by law, conducting normal business activities for One McGregor, or Resident/Participant authorization has been received in writing and signed by the Resident/Participant and/or their legal representative.

We do not, under any circumstance, disclose sensitive, personal, or confidential information that may violate the privacy or security of our Residents/Participants.

We do not authorize unnecessary or excessive access to the sensitive, personal, or confidential information that is maintained on our Residents/Participants. We maintain appropriate and effective security measures to protect against any unnecessary and/or excessive access by any employee, provider, staff member, outside contractor, or any other person or entity acting with, for, under, or on behalf of One McGregor.

Regulatory Compliance

We consistently comply with all applicable rules, laws, and regulations. All employees, staff members, providers, outside contractors, vendors, volunteers, and all others acting with, for, under, or on behalf of One McGregor are responsible for being knowledgeable about and ensuring compliance with, all applicable rules, laws, and regulations, and have an obligation to immediately report violations or suspected violations to the Compliance Officer or their direct Supervisor.



Investigations and Audits

We maintain an open, honest, and transparent relationship with all regulatory bodies and agents concerning all investigation and/or audit inquiries. All requests will receive a timely response containing complete and accurate information. We will cooperate with and be courteous to all government contractors and provide the information for which they are entitled upon request during any investigation. One McGregor is committed to maintaining transparency with all regulatory and other authorities. During an investigation all employees, providers, or any other individuals acting with, for, under, or on behalf of One McGregor shall refrain from concealment, destruction, or alteration of any documents, providing false or misleading statements, attempting to interfere with the provision of accurate information, obstruct, mislead, or delay the communication of information or records requested for the purposes of the investigation. To ensure that we fully meet all regulatory obligations, all employees, providers, or any other individuals or entities acting with, for, under, or on behalf of One McGregor is required to be informed about all areas of risk and concern in the area of compliance. The Ohio Department of Health and Human Services (ODHHS), Center for Medicare and Medicaid (CMS), and the Office of Inspector General (OIG) routinely provide guidance on how to effectively maintain compliance with all regulatory requirements. We are diligent and proactive in our response to such guidance and ensure ongoing assessment, monitoring, and auditing of these areas of our organization to ensure ongoing compliance with all applicable rules, standards, laws, and regulations.

Training and Education

We provide all our employees, providers, contractors, business associates, outside vendors, and all other individuals or entities acting with, for, under, or on behalf of One McGregor with the information, training, and education required to effectively comply with all applicable rules, standards, laws, and regulations.

Accuracy, Retention, and Disposal of Documents and Records

General

All employees, providers, staff, outside contractors, vendors, volunteers, and all other individuals or entities acting with, for, under, or on behalf of One McGregor are responsible for maintaining the integrity and accuracy of all records and documentation required to comply with all applicable regulatory and legal requirements and to ensure that all records and documentation are available to reference or exhibit our standard business practices and expectations. All employees, providers, staff, outside contractors, vendors, volunteers, and all other individuals or entities acting with, for, under, or on behalf of One McGregor shall refrain from the alteration or falsification of information on any record or document and shall further refrain from the tampering, removal, or destruction of records prior to the permitted date as established by law and outlined in the written policies and procedures of One McGregor.

Medical and business documents and records are retained in accordance with the applicable law and our record retention policy. Medical and business documents include paper documents such as letters and memos, computer-based information, electronic correspondence such as e-mails,



and/or computer files stored on an external device such as a drive, disk, or tape, and any other medium that contains information regarding the organization and/or its business activities. It is important to retain and destroy records in accordance with all legal and regulatory standards and the policies and procedures of One McGregor.

Electronic Media

We ensure that all Resident/Participant information and/or any other confidential information is not sent through electronic mail or the internet, except as required by state or Federal law and only where the information is adequately protected by encryption software. All employees, providers, staff, outside contractors, vendors, volunteers, and all other individuals or entities acting with, for, under, or on behalf of One McGregor who utilize electronic communications systems or transmit protected health information in a manner that is in violation of any legal or regulatory standard, or the policies and procedures of One McGregor is subject to disciplinary action.

Controlled Substances

We maintain strict adherence to our policies regarding prescription medications and require that all prescription drugs shall be prescribed, dispensed, handled, and stored in accordance with all applicable laws, regulations, and written policies and procedures of One McGregor. All employees, providers, staff, outside contractors, vendors, and all other individuals or entities acting with, for, under, or on behalf of One McGregor are responsible for and required to immediately report incidences of suspected or confirmed diversion to the Compliance Officer upon becoming aware of the suspected or confirmed conduct.

Relationships with Subcontractors, Suppliers, and Institutions

Business Courtesies

Nothing in this section of the Code should be considered in any way as an encouragement to make, solicit, or receive any type of entertainment or gift. For clarity purposes, please note that these limitations govern activities with those not employed by One McGregor. This section does not pertain to actions between the organization and its employees or actions between One McGregor employees and providers.

Fair Business Practices

One McGregor enjoys a history of success and an excellent reputation through honest competition and by not seeking competitive advantages through illegal or unethical business practices. We all share a duty to deal fairly with our suppliers, contractors, business partners, business associates, competitors, and employees, and may not take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair or illegal dealing practice. Unless preferential treatment is available on similar terms, to similarly situated persons within the same business industry, and in similar positions, One McGregor's directors, officers and employees should not receive preferential



treatment from our suppliers, contractors, business partners, business associates, competitors, providers, and/or employees. We manage our associate, contractor, and supplier relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices.

Receiving and Extending Gifts and Other Items of Value

A gift is anything of value that you give or receive without having to make a payment, or at a discount that is greater than the one available to a similarly positioned person. With certain limited exceptions, such as nominal gifts, promotional items or courtesies that are unsolicited, lawful and infrequent, anyone acting under One McGregor should never offer or provide, directly or indirectly, gifts, services, loans or other things of value including, but not limited to, cash, money, bribes and kickbacks, or other compensation to a One McGregor director, officer, employee, supplier, business associate, vendor, contractor, provider, or any other individual or entity acting under One McGregor. Such prohibition includes, but is not limited to, offering, or providing consulting, referral, employment, or similar position to an employee, or the employee's family member or significant other. We may not provide or allow our close family members to provide to One McGregor directors, officers, employees, suppliers, business associates, vendors, contractors, providers, or any other individuals or entities acting under One McGregor anything of value in exchange for past, current, or future business relationships with One McGregor. If you are unsure whether a particular gift or service is permissible, you should contact One McGregor's Compliance Officer or submit an anonymous report at compliance@mcgregoramasa.org. Furthermore, accepting gifts, favors, travel, and entertainment may create a conflict of interest with the employee's obligations to One McGregor, as well as constitute a violation of law.

Resources for Guidance and Reporting Violations

One McGregor will make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible or suspected misconduct. There will be no retribution or discipline for anyone who reports a possible violation in good faith. Any colleague who deliberately makes a false accusation with the purpose of harming or retaliating against another colleague will be subject to discipline.

Personal Obligation to Report

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to addressing and correcting wrongdoing wherever it may occur in our organization. We all have an individual responsibility for reporting any suspected wrongful activity by any colleague, caregiver, provider, contractor, vendor, volunteer, or any other individual or entity acting under One McGregor.

Reporting Process

At One McGregor we encourage all employees, caregivers, management, visitors, volunteers, contractors, vendors, and board members to report suspected violations of law and policy to the Compliance Officer immediately. All instances and suspected instances of noncompliance and



potential fraud, waste and abuse should be reported immediately. All reports will be investigated and addressed in a timely manner. At One McGregor we value the assistance of employees who identify actual or potential problems that the organization needs to address. We will take no retaliation against individuals or entities for reporting issues of non-compliance.

Reporting Procedure

The Compliance Officer has an obligation to conduct internal investigations of alleged violations that should be complete within sixty (60) calendar days from the date on which the Compliance Officer received the initial information regarding a potential violation. Based upon this review, the Compliance Officer will make recommendations to both upper management and the Board of Directors regarding corrective action to prevent or remedy possible fraudulent or abusive conduct. Additionally, our organization will periodically review records of discipline for compliance violations to promote consistency and fairness.

Internal Investigations of Reports

We are committed to investigating all reported concerns promptly and confidentially to the extent possible. The CEO or his/her designee will coordinate any findings from the investigations and immediately recommend corrective action or next steps to be taken. We expect all colleagues to cooperate with investigative efforts.

Corrective Action

Where an internal investigation substantiates a reported violation, it is the policy of One McGregor to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting disciplinary action as necessary, and implementing systemic changes to prevent a similar violation from recurring in the future.

Discipline

All violators of the Code will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation.

Internal Audit and Other Monitoring

One McGregor is committed to the aggressive monitoring of all compliance risk areas and its processes for fulfilling this commitment can be found in its written policies and procedures. Much of this monitoring effort is provided internally. However, in certain departments, the supervisor is expected to routinely conduct monitoring of issues that have regulatory or compliance implications or pose a risk to our organization.

Acknowledgment Process

One McGregor requires all individuals and entities acting with, for, under, or on behalf of One McGregor to sign an acknowledgment confirming they have received the Code and understand it



represents mandatory policies of One McGregor. New employees will be required to sign this acknowledgment as a condition of employment. Adherence to and support of One McGregor's Code of Conduct and participation in related activities and training will be considered in decisions regarding hiring for all candidates and colleagues and discipline up to and including termination.

Document Changes

One McGregor, from time to time, may find it necessary to make changes to this document. Should this occur, employees will be notified via regular employee communication avenues so they may review or obtain a copy of all changes and/or addendums. All violations of this Code of Conduct or other applicable statutory, regulatory and/or Part D program requirements will be taken seriously and may result in disciplinary action, up to and including termination of employment and possible legal action, including referral to law enforcement.



Acknowledgement

- By signing below, I certify that I have read, understand, and agree to this Code of Conduct Policy and my responsibilities under this policy. I understand that I can report any issues or concerns to the Compliance Officer at (216)337-4893 or (216)268-8402. A report can also be made at compliance@mcgregoramasa.org or to the DHHS OIG confidential hotline at **1-800-HHS-TIPS** (447-8477).

Employee or FDR Name

(PRINT)_____

Employee or FDR Signature

Date