



One McGregor Code of Conduct

Purpose

At McGregor and McGregor PACE (collectively, “One McGregor”) we are committed to conducting business with the highest standards of professionalism, integrity, ethics, and personal responsibility. One McGregor aims to provide the highest quality in care to those we serve, maintain resident/participant safety, reduce abuse and fraud, promote diversity in the workplace, and provide a work environment free from discrimination. As part of this commitment, we must consistently act with absolute integrity in carrying out our work, interacting with one another, and conducting our business both inside and outside the workplace. This Code of Conduct (“Code”) is part of our overall program of corporate compliance and is intended to provide guidance and to help ensure that our work is done in a professional, ethical, and law-abiding manner. It emphasizes the shared common goals and values that 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 specific provisions is critical to upholding and maintaining the organization’s mission. If you have questions regarding this Code or believe that you have witnessed a violation of any provision of this Code, please contact the Compliance Officer, Leah Bentley at (216) 268-8402 or make an anonymous report to compliance@mcgregroamasa.org. You have our assurance that no retaliation or retribution will result from asking questions, raising concerns about the Code, or reporting potential or suspected improper conduct. We are committed to the values and principles outlined in this document, and we are all responsible for, and dedicated to, ensuring that our actions consistently reflect this commitment. In this spirit, our organization operates as a team of individuals with shared values, and we expect the actions of all to reflect the high standards outlined 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.

Scope

The One McGregor Code of Conduct is an essential part of its compliance program, under which all personnel at all One McGregor campuses must operate. The Code of Conduct applies to all individuals and entities providing services or acting for, under, or on behalf of One McGregor (hereinafter “personnel”). Any violation of the responsibilities outlined in this Code of Conduct by One McGregor personnel in any department, or anyone providing services to, for, under, or One McGregor can lead to disciplinary action. While we are each responsible for adhering to and upholding our Code of Conduct, we expect all levels of management 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 leadership to be a model of acting with integrity in every respect.



Core Principles

Business Ethics: We ensure our practices comply with all federal and state laws, regulations, and organizational policies. Through the Code of Conduct, we communicate our ethical standards to those we do business with, the public, and our community.

Integrity: We value the integrity of our employees and organization and work together to ensure that everyone acts in accordance with, and consistently adheres to, our Code of Conduct.

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

Resident/Participant Safety: 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 to promote safety and have adopted a resident/Participant-safety program based on best practices.

Diversity: At One McGregor we are committed to consistently maintaining an inclusive workplace environment and ensuring that high-quality care is always provided fairly and equitably and is not based on age, race, gender identity, ethnicity, geographic location, socio-economic status, religious affiliation, sexual orientation, or any perceived disability. We strive to ensure that all judgments are based on equity and merit and that any unfair or inappropriate barriers to equity in care are eliminated.

Efficiency: At One McGregor we are committed to avoiding waste, including, but not limited to waste of equipment, supplies, ideas, and energy.

We are further committed to being available for all Participants, residents, family members, 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, organizational policies, and all relevant laws and regulations at least annually.

Non-Retaliation

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



Compliance with Laws

All activity carried out by One McGregor personnel must comply with all applicable Federal, State, and Local laws, rules, and regulations.

Confidentiality

One McGregor is committed to maintaining confidentiality. All information pertaining to our residents and colleagues, as well as all proprietary information of the organization may only be accessed by appropriate personnel for legitimate business purposes.

Privacy

At One McGregor we are committed to protecting private health information and preventing unauthorized use and disclosure in accordance with HIPAA and HITECH. We do not discuss patient information with anyone who does 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 maintaining a work environment where all individuals are treated with respect and dignity. It is our policy to ensure that the work environment is free from discrimination and harassment.

Conflict of Interest

This Code requires you to refrain from acting or performing duties where it would appear to be a conflict of interest. You are required to avoid situations where your personal interests might conflict, or may reasonably appear to conflict, with the interests of One McGregor. If you suspect that a conflict of interest exists or will arise in any capacity, please submit your concern to the Compliance Officer directly or report anonymously to the compliance hotline.

Anti-Kickback Statute

One McGregor prohibits its service providers from offering, paying, requesting, or accepting any money, benefits, or anything of value in exchange for resident services, 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.

Integrity In Patient Care

Rights and Responsibilities in Resident and Participant Care

We:

- always treat 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 equity in quality of 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 other One McGregor personnel education and training on Resident/Participant Rights to ensure that they can make appropriate decisions in this area.

Resident and Participant Personal and Protected Information

We collect information from all 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.

Absent a valid authorization signed by the resident/Participant or their legal representative, 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, or necessary in the course of conducting business activities for One McGregor.

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.

Resident-Centered Care

Dignity

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



Treatment

We provide high-quality, individualized treatment and services based on a comprehensive assessment and plan of care that addresses the clinical conditions, as well as the psycho-social determinants of health.

Resident/Participant Safety

Compliance with Laws

All employees, caregivers, providers, contractors, vendors, volunteers, and all other One McGregor personnel must comply with all rules, laws, and policies designed to improve workplace safety, such as properly controlling and monitoring dangerous materials and maintaining safe equipment.

Documentation

Employees must report all safety-related incidents to their supervisor immediately. All residents and PACE Participant events must be documented and reported to the appropriate supervisor. An incident report must be completed and submitted to the Administrator and Compliance Officer for review in determining how to remedy the issue to improve processes and effectively promote safety for all residents and PACE Participants.

Substance Use

We maintain a zero-tolerance policy for alcohol, illegal substance use, and legal or prescribed substance misuse. Marijuana possession and use are strictly prohibited on all One McGregor campuses in any form. Any employee, contractor, vendor, resident, participant, visitor, or any other One McGregor personnel under the influence of alcohol or other drugs while residing in or present on One McGregor property is subject to disciplinary action up to and including termination or eviction from the premises.

Controlled Substances

We maintain strict adherence to our policies regarding prescription medications and require that all prescription drugs must 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 One McGregor personnel are responsible for and required to immediately report incidences of suspected or confirmed substance use and/or diversion to the Compliance Officer upon becoming aware of the conduct.

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 race, religion, gender identity,



sexual orientation, pregnancy, marital status, age, nationality, ethnicity, ancestry, disability, or military status.

Community Engagement

We expect our employees and ourselves to uphold diversity, inclusion, and anti-discrimination daily, both on and off our campuses. In this spirit, we encourage all employees to report violations regardless of whether they occur on One McGregor property.

Discrimination and Harassment

We are committed to maintaining an environment free of unlawful discrimination, harassment, and intimidation. Any One McGregor personnel who has knowledge of, or suspects such treatment is encouraged to report these violations immediately. Any reports we receive will remain confidential and the reporting individual will be protected from retaliation.

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 prohibit any practice that results in unnecessary costs, including, but not limited to, submission of false claims and unnecessary treatments or services. One McGregor meets recognized standards of care in compliance with Medicaid, the Federal False Claims Act, and State of Ohio fraud, waste, and abuse prevention laws. If you know or suspect this type of activity, please contact the anonymous compliance hotline to report the issue.

Regulatory Compliance

We consistently comply with all applicable rules, laws, and regulations. All employees, staff members, providers, outside contractors, vendors, volunteers, and all other One McGregor personnel 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 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 to which they are entitled upon request during any audit or investigation. One McGregor is committed to maintaining transparency with all regulatory and other authorities. During an investigation all One McGregor personnel must 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 One McGregor personnel must be informed about all compliance areas of risk. 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 mandate ongoing assessment, monitoring, and auditing of these areas of our organization to ensure 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 One McGregor personnel information, training, and education required to effectively comply with all applicable rules, standards, laws, and regulations and provide the highest quality in care.

Accuracy, Retention, and Disposal of Documents and Records

We are all 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 for reference to exhibit our standard business practices and expectations. All employees, providers, staff, outside contractors, vendors, volunteers, and all other One McGregor personnel 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 under 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 or permitted 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 One McGregor personnel 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.

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 has earned an excellent reputation through honest competition and a refusal to seek 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, we must 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, One McGregor's directors, officers, and employees should not receive preferential treatment from our suppliers, contractors, business partners, business associates, competitors, providers, or employees. We manage our associate, contractor, and supplier relationships fairly and equitably, consistent with all applicable laws and good business practices.

Receiving and Extending Gifts and Other Items of Value

One McGregor defines a gift as "anything of value that you give or receive without having to payment or receive at a discount greater than the one available to a similarly positioned person. With certain limited exceptions, such as nominal gifts, promotional items, and courtesies that are given in an unsolicited, lawful, and infrequent manner. Anyone acting for, under, or on behalf of One McGregor must never offer or provide, directly or indirectly, gifts, services, loans, or other things of value including, but not limited to, cash, money, bribes, 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 consultation, referral, employment, or anything of value to an employee, or the employee's family member or significant other in exchange for past, current, or future business relationships with One McGregor. We may not give or allow our family members to give, any of the above-mentioned items or services of value to One McGregor directors, officers, employees, suppliers, business associates, vendors, contractors, providers, or any other individuals or entities acting for, under, or on behalf of One McGregor. If you are unsure whether a particular gift or service is permissible you should immediately report your concern to the Compliance Officer or submit an anonymous report to compliance@OneMcGregoramasa.org. Acceptance of gifts, favors, travel, and entertainment may create a conflict of interest with the employee's obligations to One McGregor and may constitute a violation of law.

Reporting Violations

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. Every effort will be made to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible or suspected misconduct. We prohibit retaliation against anyone who reports a suspected violation in good



faith. Therefore, an individual who deliberately makes a false accusation with the intent to harm or retaliate against another colleague is subject to discipline.

Personal Obligation to Report

We are committed to compliance with all relevant laws, policies, and regulations and to addressing and correcting wrongdoing wherever it may occur in our organization. We each have a duty to report suspected wrongful activity by any employee, caregiver, provider, contractor, vendor, volunteer, or any other individual or entity acting for, under, or on behalf of One McGregor.

Reporting Process

All instances and suspected instances of noncompliance and potential fraud, waste and abuse should be reported immediately. All reports will be investigated and addressed promptly. At One McGregor we value the assistance of employees who identify actual or potential problems within the organization. There will be no retaliation against individuals or entities for reporting non-compliance.

Reporting Procedure

The Compliance Officer is responsible for conducting internal investigations of alleged violations sixty (60) calendar days from the date information regarding a potential violation was received. Following the investigation, the Compliance Officer will submit recommendations to upper management and the Board of Directors regarding appropriate corrective action to prevent or remedy possible fraudulent or abusive conduct. Additionally, One McGregor periodically reviews 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 investigation and immediately implement corrective action or next steps to be taken. We expect all personnel to cooperate with investigations into these matters.

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 personnel to sign an acknowledgment confirming they have received the Code and understand it represents mandatory policies of One McGregor. New employees must 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 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@OneMcGregoramasa.org or to the DHHS OIG confidential hotline at **1-800-HHS-TIPS** (447-8477).

Name

(PRINT) _____

Signature

Date