Presbyterian Villages of Michigan

Code of Conduct

Dear Presbyterian Villages of Michigan Colleague:

Presbyterian Villages of Michigan, including all of its member facilities ("PVM") is committed to providing quality care to our residents. As part of this endeavor, we must demonstrate consistently that we with absolute integrity in the way we do our work and conduct our business.

This Code of Conduct (the "Code") is intended as a means of providing guidance to ensure that our work is done in an ethical and legal manner. It emphasizes the shared common values that guide our actions. It contains resources to help resolve any questions about appropriate conduct in the work place. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is an important part of the future.

If you have any questions regarding this Code or encounter any situation that you believe violates provisions of this Code, you should immediately consult your supervisor, another member of the management team or the Corporate Compliance Officer. You have our personal assurance there will be no retribution for asking questions or raising concerns about the Code or for reporting possible improper conduct.

We are committed to the ideals expressed within this Code of Conduct. We are equally committed to assuring that our actions consistently reflect our words. In this spirit, we want this organization to be a family of men and women of shared values, and we expect all of our colleagues' actions to reflect the high standards set forth in this Code of Conduct. We also understand, however, that no code of conduct can substitute for our own internal sense of fairness, honesty and integrity. We ask you assist us and all of our colleagues in this organization in supporting the values and principles which are critical to our achieving our mission of serving our senior residents and community.

Sincerely,

Roger Myers
President and CEO

Carrie Moon-Dupree
Corporate Compliance Officer
PVM MISSION STATEMENT

The Mission of Presbyterian Villages of Michigan, guided by our Christian heritage, we serve seniors of all faiths and create new possibilities for quality living.

PVM VISION STATEMENT

To be the leader in senior living and to enhance the communities we serve.

PVM BELIEFS and VALUES

We believe in and are passionately committed to:
- Serving seniors and positively transforming senior living.
- Delivering ever-improving quality to everyone we serve.
- Meaningful engagement of dedicated staff and volunteers.
- Highest standards of ethical conduct and integrity.
- Being respectful, inclusive and welcoming to those we serve.
- Responsible stewardship of resources.
- Effective communication.
- Wellness of mind, body, and spirit.

Purpose of Our Code of Conduct

This Code of Conduct is intended to provide guidance to all PVM employees, agents, affiliates, and medical staff (collectively, our "colleagues") and to assist us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with residents and their families, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants, and one another.

The Code is intended to be a statement that is comprehensive and easily understood. In some instances, the Code deals fully with the subject covered. In other instances, the subject discussed has so much complexity that additional guidance is necessary for those directly involved with the particular area to have sufficient direction. In this regard, we remind everyone that a full copy of the PVM Corporate Compliance Program, as well as PVM policies and procedures, will be available to all colleagues and can be referred to for additional guidance in many areas.

Though the concept of management autonomy is promoted with all our affiliates, consultants, etc., the policies and practices set forth in this Code are mandatory and must be followed.

Leadership Responsibilities
While all PVM colleagues are obligated to follow our Code, we expect our Board of Trustees, Officers, Managers and affiliated physicians to lead by example. They must help to create a culture within PVM which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to raise concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Our Commitment to the Community and its Residents

PVM affirms the following commitments:

To the community it serves:

PVM is committed to understanding the particular needs of the community it serves and to providing the community with quality, cost effective healthcare. PVM recognizes that it has a responsibility to assist those in need and proudly supports charitable contributions and worthy causes within the community it serves.

To its residents:

PVM will provide quality medical care that is compassionate, promptly delivered and cost effective.

Resident Rights - Our primary mission is to provide quality health care and services to all of our residents. It is of paramount importance that we provide the highest standard of quality care possible. We treat all residents with respect and dignity and provide care that is both necessary and appropriate. We make no distinction in the care we provide based on race, color, religion, or national origin. Clinical care is based on identified resident healthcare needs, not on resident or organization economics.

We assure residents' involvement in all aspects of their care and obtain informed consent for treatment. As applicable, each resident or resident representative is provided with a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, estimates of treatment costs, and an explanation of the risks and benefits associated with available treatment options.

Residents and their representatives are accorded appropriate confidentiality, privacy, and opportunity for resolution of complaints. Residents are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. PVM colleagues will continue to receive education on resident rights issues and their role in supporting residents' rights.

Resident Information - We collect information about residents' medical condition, history, medication, and family illnesses to provide the best possible care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. We do not release or discuss resident-specific information with others unless it is necessary to serve the resident, to receive payment, or required by law.
PVM colleagues must never disclose confidential information that violates the privacy rights of our residents. No PVM colleague or other healthcare partner has a right to any resident information other than that necessary to perform his or her job.

Residents can expect that their privacy will be protected and that resident specific information will be released only to persons authorized by law or by the resident's written consent. In an emergency situation, when requested by an institution or physician then treating the resident, the resident’s consent is not required, but the name of the institution and the person requesting the information must be verified. This should be done as a call back process.

**Quality of Care**

PVM's responsibility to the communities and residents it serves is to provide the highest standard of quality care possible. In order to meet the high standards it sets for itself, PVM provides education and training to its clinical staff, with the goal of ensuring that such staff always maintains a current understanding of the clinical care issues of PVM residents.

The level and competency of staff is critical in any effort to provide quality care. PVM expects its colleagues to comply with and, be faithful to work schedules, attendance obligations and timelines. Unexcused absences, tardiness or other behavior which leaves a PVM facility unnecessarily short staffed will not be tolerated.

Resident care is dictated and directed through resident care plans. PVM clinical staff and colleagues are expected to fully carry out all resident care assignments and to provide thoughtful comments and information that may be helpful for the revision of a resident's care plan. PVM colleagues are expected to notify a supervisor of any and all resident care issues or concerns which need resolution or attention that is beyond the ability, skill level or authority of the individual colleague. PVM colleagues are expected to ask for help if they are unclear about a resident care assignment or if they do not understand something relative to a resident or his/her care. In this regard, PVM colleagues are expected to tell a supervisor, facility administrator or the compliance officer if they believe they need or would benefit from further education or training on the performance of a particular procedure or in providing any care to a resident.

PVM expects its colleagues to treat all PVM residents with the same level of care, respect, understanding and compassion as anyone of us would was or expect for our own loved ones. To this end, PVM expects that any PVM colleague who has any reason to believe another PVM colleague, another resident or anyone else is abusing, causing harm to, disrespecting or otherwise injuring a resident will immediately report his/her suspicions to a supervisor, facility administrator or the Compliance Officer. In addition, a PVM colleague must immediately report any and all concerns he or she may have about the quality or competency of care another PVM colleague, a physician, or anyone else is providing to a resident to his/her supervisor, facility administrator or the Compliance Officer.

**A Healthy Working Environment**
Although PVM is an "at will" employer, it is committed to a work environment which treats all individuals with fairness, dignity, and respect, and affords them an opportunity to provide the highest quality of care to our residents, in a setting in which all ideas are valued.

**Diversity and Equal Employment Opportunity:**

Our colleagues provide us with a wide complement of talents which contribute greatly to our success. We are committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity and respect. We will comply with all laws, regulations, and policies related to non-discrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions.

No one shall discriminate against any individual with a disability with respect to any offer, or term or condition, of employment. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

**Harassment and Workplace Violence**

Each PVM colleague has the right to work in an environment free of harassment. We will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place within PVM.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery, theft, and other commercial crimes, stalking cases, violence directed at the employer, terrorism, and hate crimes committed by current or former colleagues. As part of our commitment to a safe workplace for our colleagues, we prohibit colleagues from possessing firearms, other weapons, explosive devices, or other dangerous materials on any PVM premises. Colleagues who observe or experience any form of harassment or violence should report the incident to their supervisor, a member of management, or the Corporate Compliance Officer.

**Health and Safety**

All PVM facilities must comply with government regulations and rules, and with PVM policies and facility practices that promote the protection of workplace health and safety. Our policies have been developed to protect you from potential workplace hazards. You should become familiar with and understand how these policies apply to your specific job responsibilities and seek advice from your supervisor or the Safety Officer whenever you have a question or concern. It is important for
you to immediately advise your supervisor of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken to resolve the issue.

**Affiliations with Physicians and Professionals**

PVM is committed to a work environment which has excellent facilities, modern equipment and outstanding professional support.

Any business arrangement with a physician must be structured to ensure precise compliance with legal requirements. Such arrangements must be in writing and approved by PVM's legal counsel.

In order to legally and ethically meet all standards regarding referrals and admissions, PVM will not pay for referrals, nor accept payment for referrals that we make. Individuals affiliated with PVM are prohibited from soliciting or receiving anything of value, directly or indirectly, in exchange for the referral of residents. Similarly, when making resident referrals to another healthcare provider, PVM colleagues may not take into account the volume or value of referrals that the provider has made (or may make) in return.

**License and Certification Renewals:**

Colleagues and individuals retained as independent contractors in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with Federal and state requirements applicable to their respective disciplines. To assure compliance, PVM may, at any time, require evidence of the individual having a current license or credential status. PVM will not allow any colleague or independent contractor to work without valid, current licenses or credentials.

**Substance Abuse and Mental Acuity:**

To protect the interests of our colleagues and residents, we are committed to an alcohol and drug-free work environment. All colleagues must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on PVM work time or property may result in immediate termination and/or loss of privileges, where applicable. PVM reserves the right to use drug testing as a means of enforcing this policy.

It is also recognized that individuals may be taking prescription drugs, which could impair judgment or other skills required in job performance. If you have questions about the effect of such medication on your performance, consult with your supervisor.

**Integrity in Our Business Operations**

PVM will work with its third-party payers in a manner which reflects its commitment to contractual obligations and reflects its shared concern for quality healthcare, efficiency and cost effectiveness.
Coding and Billing for Services:

PVM attempts to take great care to assure that all billings to government and to private insurance payers reflect truth and accuracy, and conform to all pertinent Federal and state laws and regulations. All PVM colleagues and agents are prohibited from knowingly presenting, or causing to be presented, claims for payment or approval which are false, fictitious, or fraudulent.

PVM will operate oversight systems designed to verify that claims are submitted only for services actually provided and that services are billed as provided. These systems will emphasize the critical nature of complete and accurate documentation of services provided. As part of our documentation effort, we will maintain current and accurate medical records.

Cost Reports:

As a result of its participation in various government insurance programs, PVM is required to submit certain reports of its costs of operation. Federal and state laws define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries. PVM attempts and intends to comply with all federal and state laws relating to the filing of its cost reports.

Conflict of Interest:

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use PVM resources for other than PVM purposes. It is your obligation to ensure that you remain free of conflicts of interest in the performance of your responsibilities at PVM. If you have any question about whether an outside activity might constitute a conflict of interest, you should obtain the approval of your supervisor before pursuing the activity.

Controlled Substances:

Some PVM colleagues routinely have access to prescription drugs, controlled substances and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. It is extremely important that these items be handled properly and only by authorized individuals to minimize risks to us and to residents. If you become aware of the diversion of drugs from PVM or from another institution, organization, or source associated or affiliated with PVM, you must report the incident immediately.

Subcontractors, Suppliers, and Institutions:

PVM must manage its subcontractor and supplier relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices. PVM seeks to promote
competitive procurement of supplies and services to the maximum extent practicable. The selection of subcontractors, suppliers, and vendors is made on the basis of objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply. Purchasing decisions are based upon the supplier's ability to meet our needs and not on personal relationships and friendships.

**Regulatory Compliance:**

PVM provides varied long term care and assisted living services. These services generally may be provided only pursuant to appropriate Federal, state, and local laws and regulations. Such laws and regulations may include subjects such as certificates of need, licenses, permits, accreditation, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, residents' rights, medical staff membership and clinical privileges, corporate practice of medicine restrictions, and Medicare and Medicaid regulations. The organization is subject to numerous other laws in addition to these healthcare regulations.

We will comply with all applicable laws and regulations. All colleagues, including all privileged practitioners and contract service providers must be knowledgeable about and ensure compliance with all laws and regulations; and should immediately report violations or suspected violations of any law or regulation to a supervisor, member of management, or the Corporate Compliance Officer.

PVM will be forthright in dealing with any billing inquiries. We will cooperate with and be courteous to all government inspectors and provide them with the information to which they are entitled during an inspection.

During a government inspection, you must never conceal, destroy, or alter any documents; lie, or make misleading statements to a government representative. You should not attempt to cause another colleague to fail to provide accurate information or obstruct, or mislead the communication of information or records relating to a possible violation of law.

In order to ensure that we fully meet all regulatory obligations, PVM colleagues must be informed about stated areas of potential compliance concern. The Department of Health and Human Services, and particularly the Office of Inspector General, has routinely notified healthcare providers of areas in which these government representatives believe insufficient attention is being accorded government regulations. PVM will provide its colleagues with periodic information and education on applicable related matters so that each of us has the tools needed to comply with all applicable laws and regulations.

**Accuracy, Retention, and Disposal of Documents and Records:**

Each PVM colleague is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure that records are available to reflect and/or defend our business practices and actions. No one may alter or falsify information on any record or document. Medical and business documents and records are retained in accordance with the law and our record retention policy.
It is important to retain and destroy records appropriately according to our policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

**Confidential Information:**

Confidential information about PVM’s operations is a valuable asset. Although you may use confidential information to perform your job, it must not be shared with others outside of PVM, unless the individuals have a legitimate need to know this information (as determined by the Administrator of a facility or the Compliance Officer) and have agreed in writing to maintain the confidentiality of the information. Confidential Information includes personnel data maintained by the organization, resident lists and clinical information, pricing and cost data, information pertaining to affiliations, financial data, research data, strategic plans, marketing strategies, techniques, employee lists, and proprietary computer software.

**Electronic Media:**

All communication systems, electronic mail, Internet access, or voice mail are the property of the organization and are to be primarily used for business purposes. Resident or confidential information should not be sent through electronic mail or the Internet. Colleagues who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

**The Corporate Compliance Program**

**Program Structure:**

The Corporate Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. That commitment permeates all levels of the organization. The Board of the Trustees oversees this process and there is a Corporate Compliance Team and a Corporate Compliance Officer. These individuals are prepared to support you in meeting the standards set forth in this Code:

Corporate Compliance Officer is:

- Carrie Moon-Dupree

Members of the Corporate Compliance Team are:

- Lynda Jeffries (PVM Chair of the Board)
- Ted Payne (PVM)
- Michael Marston (Village of East Harbor)
- Carrie Hays McElory (Village of Redford.)
Resources for Guidance and Reporting Violations:

To obtain guidance on an ethics or compliance issue or to report a suspected violation, you may choose from several options. We encourage the resolution of issues at a local level whenever possible. It is an expected good practice, when you are comfortable with it and think it appropriate under the circumstances, to raise concern first with your supervisor. However, if this is uncomfortable or inappropriate, another option is to discuss the situation with another member of management or with the Corporate Compliance Officer.

PVM will make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct. There will be no retribution or discipline for anyone who reports a possible violation in good faith. However, any colleague who deliberately makes a false accusation for 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 correcting wrongdoing wherever it may occur in the organization. Each colleague has an individual responsibility for reporting any activity by any colleague, physician, affiliate, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, or this Code.

Internal Investigations of Reports:

We are committed to investigate all reported concerns promptly and confidentially to the extent possible. The Corporate Compliance Officer will coordinate any findings from the investigations and immediately recommend corrective action or changes that need to be made. We expect all colleagues to cooperate with investigative efforts.

Corrective Action:

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

Discipline:

All violators of this Code will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and may result in a verbal
warning, suspension, restitution or the following Quality Improvement disciplinary steps:

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<th>Step One:</th>
<th>Step Two:</th>
<th>Step Three: Termination</th>
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<td>Written warning</td>
<td>Final written warning</td>
<td>Immediate termination may result depending upon the severity of the offense.</td>
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### Internal Audit and Other Monitoring:

PVM is committed to the aggressive and responsible monitoring of compliance with its policies. Much of this monitoring effort is provided internally by the Corporate Compliance Officer. However, in certain departments, the manager may be expected to conduct internal audits of issues that have regulatory or compliance implications. In addition, PVM may routinely seek other means of ensuring and demonstrating compliance with laws, regulations, and PVM policy.

### Contacting the Corporate Compliance Officer:

The PVM Corporate Compliance Officer, Carrie Moon-Dupree may be reached as follows:

- **Telephone (Direct Dial):** (248) 281-8173
- **Email Address:** cmoon-dupree@pvm.org
- **Mailing Address:**
  - Corporate Compliance Officer
  - Presbyterian Villages of Michigan
  - 26200 Lahser Road
  - Suite #300
  - Southfield, MI  48034

### Acknowledge Process:
PVM requires all colleagues to sign an acknowledgement confirming they have received the Code and understand it represents mandatory policies of PVM. New colleagues will be required to sign this acknowledgement as a condition of employment.

Adherence to support of PVM’s Code of Conduct and participation in related activities and training will be considered in decisions regarding hiring, promotion and compensation for all candidates and colleagues.

Employee Acknowledgement

I certify that I have received, read and understand Presbyterian Villages of Michigan's Code of Conduct and hereby agree to abide by the specific provisions, requirements, policies, and procedures referenced therein. I will strive to comply with all applicable laws, rules and regulations and will, at all times, display the utmost integrity and moral conduct and fulfill my responsibilities in an ethical manner.

I have had an opportunity to ask questions about the information contained in the Code of Conduct and understand that it is my responsibility to contact my supervisor, or manager, or the Corporate Compliance Officer if, in the future, I have any questions or confusion regarding my obligations and responsibilities as stated in the Code of Conduct.

________________________________________________________
Signature