



## Code of Conduct

Stepworks is committed to abide by a code of conduct and business practices consistent with our mission statement and core values of honesty, integrity, and respect. Stepworks' code of conduct promotes our reputation for integrity in the community and also ensures that Stepworks is compliant with applicable laws, rules, and regulations. Specific policies that expand on the code of conduct can be found at [Stepworks University](#).

### Business Activities

Stepworks' mission is to create a place where we would send our own family for treatment. All employees are expected to abide by this mission and our core values. Stepworks is committed to following all applicable policies, regulations, laws, licensing, and accreditation requirements and will not offer or perform services for which it is not licensed or accredited. Employees are prohibited from knowingly violating any state or federal statute or any procedures adopted by the business relating to contracts, bidding, accounting, financial reporting, and disclosure procedures. All employees are required to understand and abide by the laws, rules, regulations, and internal policies and procedures which apply to them in the performance of their jobs.

### Professionalism

Stepworks promotes the highest standards of professional and ethical conduct. Stepworks employees shall strive to treat all patients, coworkers, family members, referral sources and any other business relation with kindness, courtesy, respect, patience, and understanding. Employees are expected to be honest, fair, and objective in professional relationships. Stepworks employees should refrain from engaging in any activity that gives the appearance of impropriety.

### Providing Excellent Care

Each patient is an individual and should be treated as such. We have an ethical responsibility to treat our patients with dignity, giving consideration to their needs and desires. We also have a legal responsibility to comply with all applicable laws and regulations related to patients' rights. Steps should be taken so each patient understands and participates in their treatment. At all times, competent and qualified individuals will provide appropriate care and give due consideration to the safety and well-being of our clients. All employees shall uphold the professional standard of care, report patient safety concerns, and engage in quality improvement activities.

### Discrimination and Harassment

Stepworks employees will treat all patients, co-workers, and anyone they come into contact with at Stepworks with respect and will not discriminate against any person for any reason as prohibited by applicable state and federal law. Furthermore, Stepworks prohibits harassment of anyone in any form by supervisors, staff, customers, or vendors.

### Protecting Confidential Information

Stepworks is committed to maintaining the confidentiality of client, personnel, and other administrative records in accordance with applicable legal and ethical standards. Stepworks employees shall access confidential information and share it with others only when authorized to do so and for the purpose of doing their job. All employees will follow applicable laws and policies when releasing confidential information and report concerns to appropriate parties. Stepworks will investigate and report breaches of patient information and take steps to secure our



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systems from unauthorized access and comply with information security policies.

In addition, all employees and other associates with access to Stepworks' information system shall sign and abide by our security and confidentiality agreement, which includes the protection of confidential passwords and other access information.

### Keeping Accurate & Complete Records

Stepworks will keep accurate records about our patients, our employees, and financial transactions. All client records must meet the documentation standards required for quality care and reimbursement regulations. It is essential that every employee engage in honest and accurate record-keeping on behalf of Stepworks. No employee should knowingly make any false or misleading statement on any form or to any officer, employee, or auditor of Stepworks. No employees should ever alter or destroy records in violation of the law or Stepworks' policy.

### Human Resources

It is the policy of Stepworks to establish and follow fair, consistent, and non-discriminatory employment practices in compliance with all applicable federal and state regulations. All Stepworks employees are to be appropriately credentialed, licensed, and otherwise qualified to perform their duties and subscribe to the professional and ethical standards of their disciplines. Stepworks does not employ individuals excluded from federal healthcare programs or who have been convicted of crimes which prohibit them by federal or state law from working with Stepworks' patients.

### Workplace Safety

The health and safety of our patients and employees is a priority of Stepworks. We comply with health and safety laws, and employees should report any safety concerns. Stepworks employees shall follow policies for handling and disposing of hazardous materials and maintain a work environment free from violence and disruptive behavior.

### Fraud, Waste, Abuse & Wrongdoing

Stepworks will provide care that is medically necessary, and we will handle claims for payment of services with integrity to avoid fraud, waste, and abuse. All employees are expected to comply with federal healthcare program requirements. We will only bill for medically necessary services that are rendered by eligible providers and properly documented and coded. We will respond to patient and payer questions in an accurate and timely manner. We will correct any billing errors of which we have knowledge and refund payments received in error with appropriate documentation. Employees are expected to notify their supervisor if they become aware of any inaccuracy so that it can be corrected. The compliance officer should be contacted with any concerns of wrongdoing.

### Marketing

Stepworks will only engage in ethical marketing practices. False advertising and deceptive representation of services are prohibited. We comply with marketing policies and laws related to truth in advertising.

### Contractual Relationships

Stepworks will not offer or accept bribes or kickbacks. Bribes and kickbacks are money, gifts, or special treatment given to someone in exchange for a favor. Favors could be a



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promise to make patient referrals to a specific source or a promise to use a particular vendor's product. Stepworks will not accept something of value for patient referrals or a vendor contract. This includes money, services, gifts, entertainment, or anything else of value to the recipient. All referrals are based on the needs of the patient.

### Conflict of Interest

Stepworks employees will disclose any actual or potential conflict of interest to the board for management. Conflicts of interest are situations in which personal considerations may affect, or have the appearance of affecting, an employee's loyalty and ability to fulfill their responsibilities to Stepworks. Some examples might be simultaneous employment with a competitor or causing Stepworks to contract with a vendor with whom the employee might have a personal or financial interest.

### Gifts and Gratuities

Stepworks employees are prohibited from accepting personal fees or commissions from any transactions on behalf of or related to Stepworks or its property. Employees will not accept gratuities or inappropriate gifts from patients. Employees are prohibited from accepting compensation, services, benefits, payment, gratuities, or any other type of consideration from any organization doing business or seeking to do business with Stepworks. Traditional holiday gifts from referral sources or business vendors to the facility are acceptable.

### Social Media

Stepworks employees may not disclose confidential or proprietary information about Stepworks, its patients, or its employees on

social media. Employees should not take or transmit photographs, video, or recording of patients or staff in the workplace except as sanctioned by Stepworks.

### Property

All employees should protect and preserve the assets and resources of Stepworks by following procedures to prevent their loss, theft, or unauthorized use. Stepworks adheres to all applicable intellectual property laws. Stepworks will respect and safeguard the personal property of all patients, visitors, and personnel.

### Setting Boundaries

Stepworks staff will maintain professional relationships with clients and other staff members at all times. Employees should not foster or pursue relationships, romantic or otherwise, with patients outside the bounds of Stepworks' policies.

### Witnessing of Legal Documents

Stepworks employees may witness documents such as consent to treat agreements, release of information forms, and advanced directives. Staff members who may be a notary public may also notarize documents according to their appointment. Patients will not be charged for this service.

### Personal Fundraising

Stepworks employees may solicit funds from other staff members for personal causes such as selling Girl Scout Cookies, selling raffle tickets to benefit their child's school, or raising funds for a charitable organization. Political or other fundraising is prohibited. Stepworks employees are prohibited from soliciting patients or asking patients to solicit for an



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employee. Employees may not distribute third-party literature, promotional material, or other work during scheduled work time or while on company property.

### Compliance Concerns and No-Reprisal

Employees are encouraged to contact the compliance officer whenever they need direction or clarification regarding compliance issues (including this code of conduct). Employees are required to report suspected violations of this code of conduct, policies, procedures, the law, or regulations to a supervisor, the compliance officer, or the anonymous compliance hotline.

Retaliation is not permitted against anyone who seeks advice, raises a concern, or reports misconduct in good faith. Such retaliation should be reported immediately to the compliance officer.

#### HOW TO CONTACT THE COMPLIANCE OFFICE:

1. Call the chief compliance officer directly at 800-545-9031, ext. 3000;
2. Call the compliance hotline anonymously at 800-545-9031, ext. 3200;
3. Email the chief compliance officer at [nicole@stepworks.com](mailto:nicole@stepworks.com); or
4. Mail questions or concerns to Stepworks Recovery Centers, ATTN: Chief Compliance Officer, PO Box 6209, Elizabethtown, KY 42702.

### Violations of this Code of Conduct

Any violations of this policy or refusal to sign this policy may be grounds for immediate discipline, up to and including termination. This includes not reporting the knowledge of another employee's violation of this policy.