

Stepworks is committed to abide by a code of conduct and business practices consistent with our mission statement, strategy, and standards. 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 under documents in Zenefits.

Business Activities

Stepworks' mission is to help people hurt by addiction reclaim their dignity and build a better life. 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. Team members 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 team members 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 team members shall strive to treat all patients, coworkers, family members, referral sources and any other business relation with kindness, courtesy, respect, patience, and understanding. Team members are expected to be honest, fair, and objective in professional relationships. Stepworks team members

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 patients. All team members shall uphold the professional standard of care, report patient safety concerns, and engage in quality improvement activities.

Discrimination and Harassment

Stepworks team members 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, team member, customers, or vendors.

Protecting Confidential Information

Stepworks is committed to maintaining the confidentiality of patient, personnel, and other

administrative records in accordance with applicable legal and ethical standards. Stepworks team members shall access confidential information and share it with others only when authorized to do so and for the purpose of doing their job. All team members 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 systems from unauthorized access and comply with information security policies.

In addition, all team members 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 and Complete Records

Stepworks will keep accurate records about our patients, our team members, and financial transactions. All patient records must meet the documentation standards required for quality care and reimbursement regulations. It is essential that every team member engage in honest and accurate record-keeping on behalf of Stepworks. No team member should knowingly make any false or misleading statement on any form or to any officer, team member, or auditor of Stepworks. No team member 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 team members 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 team members is a priority of Stepworks. We comply with health and safety laws, and team members should report any safety concerns. Stepworks team members shall follow policies for handling and disposing of hazardous materials and maintain a work environment free from violence and disruptive behavior.

Fraud, Waste, Abuse and 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 team members 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. Team members are expected to notify their supervisor if they become aware of any inaccuracy so that it can be corrected. The compliance office 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 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 team members 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, a team member's loyalty and ability to fulfill their responsibilities to Stepworks. Some examples might be simultaneous employment

with a competitor, owning or operating a sober living home, or causing Stepworks to contract with a vendor with whom the team member might have a personal or financial interest.

Gifts and Gratuities

Stepworks team members are prohibited from accepting personal fees or commissions from any transactions on behalf of or related to Stepworks or its property. Team members will not accept gratuities or inappropriate gifts from patients. Team members 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 team members may not disclose confidential or proprietary information about Stepworks, its patients, or its team members on social media. Team members should not take or transmit photographs, video, or recording of patients or team members in the workplace except as sanctioned by Stepworks.

Property

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

Witnessing of Legal Documents

Stepworks team members may witness documents such as consent to treat agreements, release of information forms, and advanced directives. Team 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 team members may solicit funds from other team 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 team members are prohibited from soliciting patients or asking patients to solicit for a team member. Team members 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

Team members are encouraged to contact the chief operating officer whenever they need direction or clarification regarding compliance issues (including

this code of conduct). Team members are required to report suspected violations of this code of conduct, policies, procedures, the law, or regulations to a supervisor, the compliance office, 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 office.

How to Contact the Compliance Office

1. Call the chief operating officer directly at 800-545-9031, ext. 3000;
2. Call the compliance hotline anonymously at 800-545-9031, ext. 3200;
3. Email the chief operating officer at nicole@stepworks.com; or
4. Mail questions or concerns to Stepworks Recovery Centers, ATTN: Compliance Office, 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 team member's violation of this policy.

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