

Code of Conduct

At Howard Brown Health, all individuals including vendors, patients, community members, volunteers, staff members, interns, Board members, and guests agree to follow minimum standards of conduct as a condition to enter its spaces, access its services, or otherwise affiliate with the organization. These agreements promote diversity, equity, inclusion, safety, and well-being for all people engaged in the life of the organization:

- Foster respect, equity, and inclusion.
- Celebrate diversity.
- Refrain from hostile, abusive, and offensive language and behaviors.
- Stop acts of discrimination and sexual harassment in any form.
- Protect the health and safety of others.
- Protect confidential information.
- Respect individual rights to privacy.

Furthermore, Howard Brown Health's representatives – inclusive of its staff members, officers, volunteers, interns, vendors, and Board members– agree to:

- Deliver exceptional services.
- Conduct business with honesty and integrity.
- Avoid conflicts of interest.
- Adhere to all applicable local, state and federal laws.
- Respect intellectual property.
- Protect physical and financial assets.
- Stop acts of fraud, waste, and abuse.
- Comply with anti-kickback, anti-trust, anti-discrimination, and anti-harassment laws and regulations.
- Adhere to agency policy on gifts, meals, and entertainment.
- Foster workplace environment free of substance use or impairment.
- Use social media responsibly.
- Use good judgment when pursuing outside activities and interests that may reflect upon Howard Brown.
- Maintain accurate and complete records in compliance with applicable laws and funders/grantor requirements.
- Safeguard the environment by following applicable laws, rules, and regulations for health and safety.

Violations of the Howard Brown Health Code of Conduct must be reported immediately to management and/or its external independent ethics hotline at <https://howardbrown.ethicspoint.com> or 1-855-654-5550. Learn more about the Code of Conduct on the Hub.

Código de Conducta

En Howard Brown Health, todas las personas, incluidos proveedores, pacientes, miembros de la comunidad, voluntarios, miembros del personal, internos, miembros de la Junta y los invitados, aceptan seguir los estándares mínimos de conducta como condición para ingresar a sus espacios, acceder a sus servicios o afiliarse de otra manera a la organización. Estos acuerdos promueven la equidad, la diversidad, y la inclusión de todas las personas involucradas en la vida de la organización:

- Fomentar el respeto, la equidad, y la inclusión.
- Celebrar la diversidad.
- Abstenerse de lenguaje y comportamientos hostiles, abusivos y ofensivos.
- Detener los actos de discriminación.
- Proteger la salud y la seguridad de los demás.
- Proteger la información confidencial.
- Respetar los derechos individuales a la privacidad.

Además, los representantes de Howard Brown Health, incluidos los miembros de su personal, funcionarios, voluntarios, internos, proveedores y miembros de la Junta, acuerdan:

- Brindar servicios excepcionales.
- Realizar negocios con honestidad e integridad.
- Evitar conflictos de intereses.
- Adherirse a todas las leyes locales, estatales y federales aplicables.
- Respetar la propiedad intelectual.
- Proteger los activos físicos y financieros.
- Detener los actos de fraude, despilfarro y abuso.
- Cumplir con las leyes y regulaciones anti-retroceso, antimonopolio, antidiscriminatorio y anti-acoso.
- Adherirse a la política de la agencia sobre regalos, comidas y entretenimiento.
- Fomentar un entorno en el trabajo libre de uso de sustancias o discapacidad.
- Usar las redes sociales de manera responsable.
- Usar el buen juicio cuando busque actividades e intereses externos que pueden recaer a Howard Brown.
- Mantener registros precisos y completos de conformidad con las leyes aplicables y los requisitos de los financiadores / otorgantes.
- Salvaguardar el medio ambiente en siguiendo leyes, normas, y regulaciones que aplican para mantener la salud y seguridad.

Las infracciones del Código de Conducta de Howard Brown Health se deben informar de inmediato a la gerencia y / o a su línea directa externa de ética independiente <https://howardbrown.ethicspoint.com> o 1-855-654-5550. Obtenga más información sobre el Código de conducta en Hub.

Tenets

The Code of Conduct (“Code”) expresses Howard Brown Health’s commitment to model principles of diversity, equity and inclusion, operate ethically and to lead with integrity, which are core values of the organization. The Code shows how to uphold this commitment among stakeholders and with Howard Brown’s various constituents.

To Whom Does the Code Apply

The Code provides guidelines for conducting business on behalf of Howard Brown Health (“HBH”) and applies to all people who are affiliated with the entity, especially its Board members, employees, interns, volunteers, business associates, vendors, patients and guests. Without exception, this Code applies equally to everyone at all levels in the organization. HBH also expects community partners to know and follow the Code.

HBH Representatives: Our Responsibilities

As staff members, officers, volunteers, interns, vendors, and Board members, we have made a commitment to understand and follow the behaviors set forth in this Code:

- Understand and act according to this Code and HBH’s policies, applicable laws and regulations;
- Seek guidance from Management, Compliance Department, or Legal Department when questions arise;
- Complete the required compliance and risk training programs within the requested deadlines to keep up-to-date on current standards and expectations;
- Fully cooperate with any internal investigations; this includes being honest and accurate with information and timely with requests and deadlines;
- Assume ownership and accountability for one’s actions and behaviors;
- Model, promote, and uphold the highest of standards and behaviors to celebration all dimensions of diversity, equity and inclusion for all people;
- Address issues adhering to the Code of Conduct directly with the person involved in a confidential, positive and professional manner; where appropriate report instances to a manager, human resources or the compliance officer;
- Avoid discussing questionable conduct, concerns and conflicts in front of others; and
- In meeting their responsibilities or delivering care, HBH representatives must always comply with applicable laws and regulations.

Additional Responsibilities for Supervisors, Leadership and Board

- Model the highest ethical standards by creating and sustaining a culture of trust, honesty, integrity, and respect.
- Be respectful and courteous in tone and treat others with respect at all times and during all situations. Retaliation and consequences targeted towards individuals

raising potential Code violations will not be tolerated.

- Be a resource for employees. Ensure that they are aware of, understand, and know how to apply this Code and HBH's policies, applicable laws and regulations in their daily work.
- Seek assistance from other managers or general counsel, compliance officer or human resource professionals when unsure of the best response to any given situation.
- Be proactive. Take reasonable actions with necessary care to prevent misconduct and to support the detection of misconduct.
- Create and maintain a work environment that encourages collaboration, cooperation and professionalism.
- Promote open communication so employees may discuss concerns without fear of retaliation.
- Conscientiously understand that their direct and indirect actions directly influence the work culture of HBH.

Code of Conduct: All Stakeholders

At Howard Brown Health, all individuals, including vendors, patients, community members, volunteers, staff members, interns, Board members, and guests, agree to follow minimum standards of conduct as a condition to enter its spaces, access its services, or otherwise affiliate with the organization. These agreements promote diversity, equity, inclusion, safety, and well-being for all people engaged in the life of the organization:

We will foster respect, equity, and inclusion.

Howard Brown Health has a zero-tolerance policy toward hostile behaviors that create breakdowns in communication and collaboration necessary to deliver quality patient care. Behaviors that undermine a culture of safety can be obvious, such as verbal outbursts and physical threats, but they can also include more passive activities such as microaggressions that exhibit a condescending attitude, or refusing to take part in assigned duties. Behaviors that undermine a culture of safety should be reported so that management can address them using the disciplinary process.

Resource(s):

- Employee Handbook
- Employee Performance Procedure
- Reporting Bullying, Harassment, Discrimination, and Retaliation Procedure

We will celebrate diversity.

We have adopted six frameworks describing the essential approaches needed for culturally competent and intersectional healthcare that uplifts individuals and families from different backgrounds and facing multiple challenges. The frameworks also describe the values and behaviors needed to foster excellent teamwork, collaboration and equity within the organization and among its workforce and officials. Howard Brown's Racial Equity, Inclusion and LGBTQ Liberation frameworks describe historical systems of oppression that perpetuate health disparities and inequities, as well as the effective mechanisms to challenge sexism, ageism, racism, and homophobic policy, behaviors, and beliefs. Other frameworks, such as Health Equity, Trauma- Informed Care, and Harm Reduction, describe caregiving modalities that attend to patterns of harm and neglect that affect wellness and a receptiveness to change. To celebrate diversity and foster equity and inclusion for all, Howard Brown expects individuals to welcome all people and treat everyone with kindness and respect regardless of their gender, gender identity, race/ethnicity, immigration status, age, ability, sexual orientation, religion or creed, and other dimensions of diversity.

Resource:

- Howard Brown Health Frameworks, 2019

We will refrain from hostile, abusive, and offensive language and behaviors.

We will refrain from any lewd, or offensive behavior or language, including but not limited to using sexually explicit or offensive language, materials, or conduct. This includes but is not limited to any language, behavior or content that contains profanity, obscene gestures, or racial, religious, gender, or ethnic slurs or undertones.

Resource(s):

- Employee Handbook

We do not tolerate discrimination and sexual harassment in any form.

We are strongly committed to a policy of nondiscrimination and equal opportunity for all qualified applicants and employees, without regard to race, color, gender, religion, age, national origin, ancestry, disability, or sexual orientation. Our policy of non-discrimination extends to the care of patients. Howard Brown Health prohibits harassment, microaggressions, or discrimination of its employees in any form by supervisors, coworkers, customers or vendors and strives to create restorative spaces and process encouraging shared accountability helping everyone co-create spaces that are brave, inclusive and welcoming. If an employee feels they or any patient has been discriminated against or harassed, they should contact their department leader, CEO, human resource leader or the compliance officer. For more information, please reference HBH's Employee Handbook.

Resource(s):

- Employee Handbook

We protect the health and safety of others.

We strive to protect the health and safety of our employees and rely on them to make sound decisions based on education and information provided. Success requires compliance with our policies and the consistent execution of safe work practices on the job. Employees can view all necessary information and policies on the Hub. Everyone is expected to complete compliance training and other relevant job training within the set deadlines.

Additionally, everyone should be familiar with the potential hazards in their workplace and comply with regulations and policies relating to their roles. Any unsafe conditions should be promptly reported to a supervisor and a ticket should be submitted into the Risk Management System.

Resource(s):

- Emergency Preparedness Plan
- Exposure Control Plan

We protect confidential information.

Confidential information includes all information that Howard Brown Health has not publicly disclosed. This includes financial information; business strategies; contract terms; employment and personnel information; and proprietary information. We safeguard our confidential information because it is one of our most valuable assets. We never use confidential information for our personal benefit, and we never disclose it to others (including family members and friends) or anyone at work who does not have a need to know it.

To protect our reputation and to make sure that any information communicated is accurate, only the communications department, or those staff members that have been approved by the department, is authorized to speak directly to the media about Howard Brown. If the media contacts you, direct them to the communications department.

We will respect individual rights to privacy.

We are committed to maintaining the confidentiality of all patient information in accordance with applicable legal and ethical standards. We comply with the Health Insurance Portability and Accountability Act (HIPAA) in that we do not use, disclose, or discuss patient specific information with others unless it is necessary to serve the patient or otherwise permitted by law. All Board Members, employees, contractors, vendors, volunteers and medical and clinical staff must abide by Howard Brown Health's policies regarding the protection of our patients' privacy as well as the protection of all aspects of our information systems.

Resource(s):

- HIPAA 1 – 23
- Destruction and Disposal of Documents
- Document and Records Management
- Document Storage
- Staff Use of Centricity

Code of Conduct: HBH Representatives

Howard Brown Health's representatives – inclusive of its staff members, officers, volunteers, interns, vendors, and Board members – agree as follows:

We will provide exceptional care and services to our patients.

Howard Brown Health Center employees, volunteers and interns shall treat all patients and clients in a way that protects their rights and preserves their dignity. No employee shall target or retaliate against a patient who files a complaint or grievance.

We will provide all patients and clients with equal access to care and will not tolerate harassment or discrimination in our environment.

We will conduct all business transactions with honesty and integrity.

All employees will conduct themselves in ways that promote and protect the reputation of Howard Brown Health. All public statements will be accurate and convey our services in a responsible manner. We will serve patients within our medical capabilities, regardless of their financial status or ability to pay.

Staff will assist in the development, execution and enforcement of internal controls to ensure contracts, payments and other business transactions are properly authorized. Additionally, we will follow our procedures and record information timely and accurately in accordance with generally accepted accounting principles. Staff will immediately report any material omission that may affect our public disclosures, or any questionable accounting or auditing matters to their supervisor, legal and compliance department.

Resource(s):

- Accounting Principles and Guidance
- Telehealth Procedure

We will avoid conflicts of interest.

All employees and board members of Howard Brown Health must avoid engaging in any activities that conflict with the interests of the Agency or its patients. Anyone with a potential conflict of interest must make a full disclosure to their supervisor, the compliance officer and general counsel. Board members who believe they may have a conflict should alert the CEO, general counsel and the compliance officer.

Resource(s):

- Conflict of Interest Procedure

We will adhere to all local, state and federal laws.

We will maintain the highest standards of legal and ethical conduct in transacting business with patients, and local, state and federal governments.

We will respect intellectual property.

Intellectual property includes copyrights and other information specific to Howard Brown. All employees must safeguard Howard Brown Health's intellectual property and keep it strictly confidential. Moreover, if you have access to another company's intellectual property, make sure you obtain authorization from the legal department to use it and that your use complies with our policies and procedures. We may also have confidentiality obligations under the terms of contracts with third parties or our grantors.

We will protect the Company's physical and financial assets.

All staff is expected to manage our physical and financial assets and other resources honestly and efficiently. Howard Brown Health's assets should be used for business purposes only. Should property become obsolete or no longer usable, such as computer equipment, it should be disposed of in accordance with applicable policies and procedures. Agency assets should be used for business purposes only and staff must obtain the proper authorization or approval prior to the use or commitment of equipment to anyone outside of Howard Brown. Any missing property or financial assets should immediately be reported as missing to your supervisor an incident report must be submitted to the Risk Management System.

We will adhere to all fraud, waste and abuse laws.

We interact with the government honestly, ethically and in accordance to the laws. We will not submit false claims or statements to a federal or state agency or in connection with any government contract.

We are committed to timely, complete and accurate coding and billing, including the following:

- We will bill only for services that we actually provide, document, are medically necessary and ordered by a provider or other appropriately licensed individual;
- We assign billing codes that we believe in good faith accurately represent the services that we provide and that are supported by documentation in the medical record according to regulatory requirements and guidelines;
- We implement good faith controls to prevent upcoding and duplicate billing for the same service,
- We do not routinely charge government payors in excess of our usual charges;
- We respond to billing and coding inquiries and timely resolve inaccuracies in previously submitted claims that are discovered and confirmed;
- We make every effort to ensure that employees and subcontractors who perform billing or coding services have the necessary skills, quality assurance processes and appropriate procedures to ensure that billings are accurate and complete; and

- We do not knowingly present, or cause to be presented, claims for payment that are false, fictitious or fraudulent.
- We make every effort to refund all patient credit balances based on our policy. All credit balances from insurer overpayments are refunded to the insurer or patient as directed by the insurer, within a reasonable timeframe.

We seek approval from the Board when seeking to provide a significant patient discount. Individual adjustments to patients' accounts must be approved by a senior administrator. We implement good faith processes to ensure collection efforts are consistent and strive to balance the service image of the Agency with the business prudence required to achieve financial goals.

All employees are expected to guard against fraud and abuse regardless of their role and position at the agency.

Resource(s):

- Accounting Principles and Guidance
- Compliance Manual and Plan

We will comply with anti-kickback, anti-trust, anti-discrimination, and anti-harassing laws.

We will not offer or accept remuneration of any kind as an inducement to make a referral for the furnishing of any item or service. Employees must avoid communications with competitors that might interfere with free and fair competition such as discussions regarding fees and how prices are set. We will conduct all business transactions free from offers or solicitations of gifts, favors and other improper inducements.

We will adhere to agency policy on gifts, meals and entertainment.

At Howard Brown, we work very hard to ensure we provide competent patient care that is ethical and has integrity. Giving or receiving gifts or hospitality to or from vendors and other referral sources can give the appearance that someone is trying to influence a business or clinical decision. Therefore, employees will not accept any gifts or gratuities to or from patients, vendors, or government officials with a value of more than \$25.

However, HBH will allow with exception token non-cash gifts of less than a \$100 value at holidays or other special, infrequent occasions. For more information, regarding exceptions to this policy or for additional information please reference HBH's Employee Handbook.

Resource(s):

- Travel Policy

We will foster workplace environments free of substance use or impairment. Howard Brown Health has a vital interest in maintaining a safe and healthy environment. Being under the influence of drugs or alcohol on the job poses serious safety and health risks to the staff member and all who may come in contact with them. While at or engaged in work activities, all staff must refrain from the use of substance and be free from the impairment caused by alcohol, drugs or other substances including but not limited to cannabis. Howard Brown Health acknowledges that outside of work or work activities, Illinois law may permit certain limited, personal uses of cannabis. However, while at work or engaged in work activities, recreational and medical use and possession of cannabis is prohibited. Staff should seek assistance through the employee assistance program (EAP) or their healthcare provider if they feel they have a concern or believe they have a substance use problem.

Resource(s):

- Employee Handbook

We will be responsible on social media.

We respect the rights of our staff to maintain personal blogs or post comments on social networking sites outside of the workplace on their own time. However, employees may not disclose on any personal blog or social networking site photographs or protected health information of patients or any other non-public confidential information of Howard Brown Health.

Additionally, employees should refrain from using social media while on work time or on work issued equipment, unless it is work-related as authorized by your manager or consistent with the Company Equipment Policy. Do not use Howard Brown's email addresses to register on social networks, blogs or other online tools utilized for personal use.

We will use good judgment when pursuing outside activities and interests.

Participation by employees in political, charitable, and other organizations is permitted and encouraged as long as it is done appropriately. However, your participation should not cause an observer to conclude that Howard Brown Health is endorsing the activity. When you are a representative of Howard Brown you are expected to act in a manner that does not reflect poorly on the agency.

Participation also must not impede your ability to perform your job.

Resource(s):

- Conflict of Interest

We will maintain accurate and complete records in compliance with applicable laws and funder/grantor requirements.

We will maintain accurate and complete medical records and other documents in accordance with funder and grantor requirements and state and federal law. Staff must cooperate with any inquiries, as well as internal and external audits and investigations.

We will safeguard the environment.

All employees are responsible for knowing and following all laws, regulations, Howard Brown Health policies and procedures for promoting health and safety. We comply with laws that safeguard the environment and promptly address any situation that results in the mishandling of storing, handling and disposing of hazardous materials, gases, chemicals and bio-wastes. Employees should immediately contact their supervisor or facilities if they have questions, or if they notice any dangers or unsafe conditions that need to be corrected.

Resources(s):

- Emergency Preparedness Plan
- Exposure Control Plan
- Environment of Care

Dissemination of the Code

The Code of Conduct will be disseminated to all new Board members, employees, interns, and volunteers during orientation and annually thereafter. In addition, the Code of Conduct is posted at all Howard Brown locations and on the Howard Brown website.

Monitoring of the Code

Human Resources and the Compliance Officer have overall responsibility for ensuring the implementation of the Code of Conduct within Howard Brown. This Code of Conduct is aligned with the HBH Board DEI Social Contract, which articulates the DEI standards Board members uphold in all instances where they are or may be viewed as representing the organization.

The Compliance Department, with support from the Human Resource Department, is the owner of the Code. Executive Leadership and the Board of Directors also oversee the code and review it annually.

Compliance with Laws, Regulations and Procedures

Each employee is expected to be aware of and comply with all applicable laws, regulations and procedures as they relate to their position. Employees unsure how the Code of Conduct or other laws, regulation and procedures at Howard Brown relate to them should consult their immediate supervisor.

Failure to Comply with the Code and Reporting Violations

All individuals subject to the Code have an obligation and are required to report violations or suspected violations, including unethical or illegal conduct. Violation of any provisions of the Code of Conduct may result in disciplinary action up to and including, if and where appropriate, employee termination or termination of an individual's relationship with Howard Brown Health. Howard Brown Health will investigate all reported perceived violations of the Code.

Employees, volunteers, Board members, and all those subject to this Code, can report any perceived, illegal and unethical actions, without fear of reprisal. Acts of retaliation or consequence targeted to any employee who reports violations to this Code will not be tolerated. Such action will result in disciplinary action up to and including employee termination or termination with an individual's relationship with Howard Brown Health.

Reporting Perceived Violations of the Code of Conduct

Employees have three options to report perceived violations of the Code.

Option 1: Open Communication

Individuals who encounter an incident with a staff member, officer, volunteer, intern, vendor, or Board members, where their behavior is not adhering to the Code of Conduct, are urged to speak directly, respectfully and privately to that person regardless of their position within the agency. Instances of prohibited behavior are inappropriate, unwelcome, and harmful; failure to refrain from prohibited behaviors can result in the termination of employment or the termination of the individual's relationship with Howard Brown Health.

Option 2: Seek Assistance

Individuals who are uncomfortable speaking with the person directly or those who are unable to resolve the issue, and/or the behaviors persist, may seek the assistance of a manager, Human Resources official, or Compliance Officer to ensure the issue is addressed.

Option 3: Confidential and Anonymous Reporting

All individuals who contact the Ethics Point hotline and website can do so anonymously or they may leave their name. Reports are sent to the Compliance Officer for review and shared with Human Resources depending on the content. Detailed responses to the ethics hotline questionnaire help advance investigations, which are only as good as the quality of the information submitted. For confidentiality reasons, individual reporting to the hotline may not hear about the details uncovered during the investigation or about the specific outcome.

Reporting Helpline 1-855-654-5550

Confidential Online Reporting Tool <https://howardbrown.ethicspoint.com>