

Standards of Conduct

ONR Code of Conduct

ONR is dedicated to providing quality health services for those under our care, and to accomplishing our mission as follows:

- To respond to the needs of residents, healthy and ill;
- To provide excellent care through multiple levels of service in selected locations as outlined under the “Scope of Patient Care” in the Clinical Policy and Procedure manual;
- To provide an environment which enhances each resident’s awareness of his or her dignity, security, comfort and peace of mind;
- To assure that the services and facilities are maintained on a fiscally responsible basis;
- To provide, through people, facilities and programs, a balance between security and independence for the resident and to assist in the achievement of the resident’s maximum physical, mental and emotional well-being.

ONR and its officers, executives, managers, employees and agents shall act consistent with the following corporate goals:

- To serve the needs of residents in health and illness in committed and caring communities;
- To further a commitment to integrity, quality, excellence and continuous improvement in all areas of service to residents;
- To manage human and material resources ethically, with creativity and vision, always mindful of changing needs and environments and the capacity to serve;
- To esteem all personnel as the providers of service, encouraging them, caring for them and nurturing their growth as individuals.

Employee Standards of Conduct

All Employees:

- Shall perform their duties in good faith and to the best of their ability;
- Shall refrain from any illegal conduct;
- Shall not obtain any improper personal benefit by virtue of his or her employment with ONR;
- Shall notify the Corporate Compliance Officer or Human Resources Representative, who will in turn notify (if applicable) Legal Counsel, immediately upon the receipt (at work or home) of an inquiry, license board hearing, subpoena (other than for medical records or other routine licensing or tax matters) or other agency or government request for information from ONR;

- Shall not destroy or alter Company information or documents in anticipation of, or in response to, a request for documents by any applicable governmental agency or from any court of competent jurisdiction;
- Shall not engage in any business practice intended to unlawfully obtain favorable treatment or business from any government entity, physician, resident, vendor or any other party in a position to provide such treatment or business;
- Shall not solicit or receive from any person or entity, nor offer or give to any person or entity, anything of value if the person or entity is in a position to refer business to ONR and/or if the Company is in a position to refer business to that person or entity;
- Shall not accept any gift, hospitality, or entertainment of more than the nominal value of \$50 from, or on behalf of, a resident; and shall not accept from any other person (1) cash or cash equivalents, (2) any gift of more than the nominal value of \$50 or (3) any hospitality or entertainment which because of its source or value might influence the officer's, executive's, manager's or agent's independent judgment in transactions involving the Company. If any gift is received as disallowed under the terms of this provision, the Employee shall notify the Corporate Compliance Officer promptly;
- Shall not provide any gifts or gratuities to any government or public agency representatives;
- Shall disclose to the Corporate Compliance Officer any financial interest, ownership interest or any other relationship that he or she (or a member of his or her immediate family) has with ONR's customers, vendors, or competitors;
- Shall not use confidential or proprietary information of the Company for his or her own personal benefit or for the benefit of any other person or entity, except the Company, while employed by the Company or at any time thereafter;
- Shall comply with HIPAA (Health Insurance Portability and Accountability Act) regulations in regards to all use and disclosure of PHI (Protected Health Information). PHI is defined as any individually identifiable health information; including, without limitation, all information, data, documentation and materials, including demographic, medical and financial information, that relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present or future payment for the provision of health care to an individual; and that either identifies the individual or provides a reasonable basis to possibly identify the individual;
- Shall promptly report all violations or suspected violations of these Standards of Conduct to the Corporate Compliance Committee. The individual may report such information anonymously. All suspected violations will be documented;
- Shall not knowingly participate in any false billing of residents, government entities or any other party;
- Shall not participate in any agreement or understanding with a customer or family member to misrepresent the amount and type of treatment a resident has received;

- Shall not participate in any agreement or understanding (including agreements based upon a course of conduct with a competitor of ONR) to illegally fix prices, agree to labor costs, allocate markets or engage in group boycotts;
- Shall review all corporate distributions of written policies and other informational updates regarding the Company's compliance programs and applicable state and federal laws and standards, including HIPAA regulations;
- Shall participate in scheduled training regarding ONR's Compliance Program and applicable state and federal laws and standards, including HIPAA regulations;
- Shall maintain excellent working relationships at all times with ONR facilities and facility staff;
- Shall disclose any disciplinary actions from any state or federal agency or HIPAA, APTA, ASHA, AOTA. Notices of disciplinary action must be reported to your immediate supervisor or Human Resources within 24 hours of receipt of notice.

Prohibited Employee Conduct

The Company takes great pride in the quality of its work force. As an ONR employee, you will be expected to adhere to the highest standards of honesty, integrity, ethics and professionalism. Your conduct and behavior, both on and off the job, reflect on the Company's image in the community. While it would be impossible to compile a list of all possible actions which could result in disciplinary actions, the following are examples of activities which will be considered a violation of Company rules of conduct. Infractions of these rules, which follow, may be grounds for disciplinary actions up to and including termination from the Company. Additionally, ONR will report to the appropriate agency all incidents that violate acceptable clinical standards.

ONR has a zero-tolerance policy regarding the following behavior:

- Conviction of a felony;
- Possession of weapons prohibited in Company weapons policy;
- Willful or negligent damage to Company property or the property of other employees;
- Theft or dishonesty, including: falsification of Company records, including but not limited to furnishing false or incomplete information on daily treatment records, electronic time entry, expense reports, or your application for employment;
- Gambling, fighting, disorderly conduct or abusive language and conduct on Company or Client premises;
- Excessive tardiness (more than three per quarter);
- Accepting or soliciting gratuities for any work done for facilities;
- Willful and deliberate destruction of or damage to clinical equipment, building, property, etc.;
- Using or selling intoxicants, narcotics or hallucinogens while on duty or reporting for work under the influence of, or while in possession of intoxicants, narcotics or hallucinogens;
- Positive drug/alcohol tests;
- Insubordination or failure to carry out any reasonable assignment given by management, including refusal to work on jobs assigned by your supervisor or refusal to follow reasonable instructions given by a physician;
- Negligence through failure to follow established procedures, careless or willful acts that could result in injury to self, another employee, resident, or damage to property;

- Smoking in restricted areas;
- Using profanity while in the presence of a resident or facility staff employee;
- Making belligerent, hostile or inflammatory remarks or demonstrating inappropriate behavior toward ONR employees and/or facility staff or residents;
- Behaving in a manner that causes a liability to ONR's Rehab contract or results in the Company's loss of its contract;
- Taking photographs of residents or patients without express authorization and/or posting photographs on social media
- Violation of the Company Code of Ethics;
- Violation of the Company Workplace Violence Policy;
- Violation of the Company Weapons Policy;
- Violation of the Company Solicitation Policy;
- Violation of the Company Conflict of Interest Policy;
- Violation of the Company Dating & Consensual Relationship Policy;
- Violation of the Company Harassment Policy;
- Violation of the Company Equal Employment Opportunity standards;
- Violation of the Company Drug and Alcohol Free Workplace Policy;
- Violation of the Company Confidentiality Policy;

The above list is not exhaustive, but does outline those acts, which are inappropriate in any employer/employee relationship. As an employee, you are asked both to comply with and to cooperate in the enforcement of the preceding rules. Current employees are expected to report conviction of a felony or misdemeanor within ten days of conviction. The Company will evaluate the gravity and job relatedness of the conviction and will determine appropriate action, up to and including termination. If the employee fails to report such a conviction while employed by the Company, disciplinary action may result in termination of employment. The violation of any of these rules could result in a serious loss to other employees and to the Company in many ways. Therefore, the Company reserves the right to impose performance improvement or discipline, up to and including termination, to anyone who does not abide by them.

All ONR Staff have a duty and responsibility to report suspected resident abuse or neglect immediately to Director of Rehabilitation level and above as well as to facility administration and state regulatory agencies as required by law.