



Business Code of Conduct

StarCare Specialty Health System's (StarCare) Business Code of Conduct provides a framework of ethical principles and guidelines to which all employees, contractors, volunteers, and board members (workforce) must adhere when representing StarCare whether acting in an official or unofficial capacity. Adherence to StarCare's Business Code of Conduct ensures all members of the workforce behave with integrity, respect, and professionalism in support of StarCare's mission. The Business Code of Conduct applies to any action of any member of the workforce that directly or indirectly relates to the conduct of StarCare's operations.

StarCare's Business Code of Conduct is reviewed annually and updated as needed to reflect changes in laws, regulations, standards of practice, and/or corporate policies.

Ethical Standards and Practice

- **Legal Compliance:** All members of the workforce must comply with applicable local, state, and federal laws and regulations, as well as Company policies, procedures, and standards.
- **Human Rights and Safety:** All people are treated with empathy, kindness, compassion, and respect. StarCare's workforce prioritizes the safety and well-being of all with whom they interact, especially clients/patients/participants. All members of StarCare's workforce respect the rights of clients/patients/participants, including their right to privacy, informed consent, and to receive high quality and appropriate care.
- **Confidentiality:** All members of StarCare's workforce protect the confidentiality of client/patient/participant health information as well as the confidentiality of all sensitive corporate information, only disclosing it when legally required or with appropriate consent.
- **Non-Discrimination:** StarCare's workforce does not discriminate in any way based on race, ethnicity, gender, age, disability, religion, sexual orientation, or on any other characteristic protected by law.
- **Conflict of Interest:** Members of StarCare's workforce avoid situations that could potentially compromise their impartiality or judgement or even have the appearance of so, including personal relationships or financial pursuits that could potentially interfere with their professional duties. Members of StarCare's workforce never use their positions to personally profit or to assist others with profiting in any way at the expense of StarCare and the people it supports. Specifically, all business is conducted free from offers or solicitation of gifts, favors, and/or other inducements in exchange for influence of any kind. All conflicts of interest, including potential conflicts of interest are reported to the Human Resources Department immediately.

- **Nepotism:** StarCare maintains a fair and impartial work environment and service delivery environment. Members of the workforce are strictly prohibited from making or influencing any decision involving family members [within three (3) degrees of consanguinity] or people with whom they have a close personal relationship. Members of the workforce are strictly prohibited from interfering in the business affairs, job duties, performance evaluations or any other job-related activity of family members or anyone with whom they have a close personal relationship. All family or close personal relationships must be disclosed to the Human Resources Department immediately.

In support of a fair and impartial work and service delivery environment, StarCare generally avoids the placement of family members or people with a close personal relationship within the same Division, Department and Program. However, on rare occasions, exceptions may be in the best interest of StarCare's mission. Exceptions are made at the sole discretion of the Chief Executive Officer.

- **Professional Conduct:** Members of StarCare's workforce perform their duties with competence, diligence, and integrity, adhering at all times to corporate expectations of professional behavior, policies and procedures. Professional conduct includes, but is not limited to:
 - **Adherence to Policies and Procedures:** following all company policies, procedures, and all applicable rules, laws and regulations.
 - **Accountability and Reliability:** fulfilling all responsibilities promptly and accurately, taking ownership of tasks and outcomes, and being reliable in attendance and punctuality.
 - **Professional Communication:** communicating with colleagues, patients, families, and all stakeholders in an honest, respectful, clear, and professional manner, whether verbally or in writing. This includes actively listening, being open to feedback, and avoiding language or behavior that could be perceived as disrespectful or inappropriate. Members of StarCare's workforce use appropriate channels to voice concerns, ask questions, or report misconduct. Members of StarCare's workforce never lie or omit parts of the truth.
 - **Collaboration and Teamwork:** working cooperatively and collaboratively with others, valuing diverse perspectives, and contributing to a positive work environment and service delivery environment.
 - **Respectful Environment:** working with kindness, honesty, transparency, and competency in all interactions. Harassment, bullying, or any form of abusive behavior are not tolerated.
 - **Appearance and Presentation:** maintaining a professional appearance reflective of StarCare's standards and values, including dressing appropriately for the workplace/worksites and being mindful of personal hygiene.
 - **Ethical Behavior:** acting with honesty and integrity in all interactions, including the avoidance of all forms of dishonesty, cheating, fraud, theft, and inappropriate behavior, and promptly reporting any such conduct if observed.

- **Commitment to Continuous Improvement:** demonstrating a commitment to personal and professional growth by seeking out opportunities for learning and development, being open to constructive criticism, and striving to improve performance and skills.
- **Safety:** following all safety guidelines and regulations, and immediately reporting any hazards, incidents, or unsafe conditions or practices to ensure a safe work environment for everyone.
- **Compliance:** following all laws, regulations, standards and policies associated with StarCare's operations.
- **Substance Use:** The use of illegal drugs or alcohol during work hours or on company premises is strictly prohibited. Prescription medications must be taken responsibly and never impair one's ability to perform one's duties.

Financial Integrity and Responsibility

- **Accurate Reporting:** All financial transactions are accurately recorded in accordance with legal requirements, company policies and procedures, and accounting standards.
- **Resource Use:** Company resources, including time, funds, equipment, and information, are used responsibly and only for legitimate business purposes.
- **Fraud Prevention:** Members of StarCare's workforce never engage in nor tolerate any form of fraud, theft, or embezzlement. Any suspected fraudulent activity must be reported immediately.

Compliance and Reporting

- **Reporting Violations:** Members of StarCare's workforce immediately report any violations of this Business Code of Conduct, company policies, or legal requirements. All reports are treated confidential and promptly investigated.
- **Non-Retaliation:** StarCare prohibits retaliation against any person who, in good faith, reports a violation or participates in an investigation. Any act of retaliation is subject to disciplinary action up to and including termination.

Acknowledgment and Acceptance

All members of StarCare's workforce are required to read, understand, and adhere to this Business Code of Conduct. Violations of this Business Code of Conduct may result in disciplinary action, up to and including termination of employment, contract, or volunteer opportunity. The nature of the disciplinary action will depend on the severity and circumstances of the violation.

By signing below, you acknowledge you have read and understand the Business Code of Conduct and agree to comply with its terms.

Signature

Date