

CATHOLIC CHARITIES OF BROOME COUNTY Standards of Conduct

Mission and Values

Catholic Charities of the Roman Catholic Diocese of Syracuse (Catholic Charities of Broome County) is dedicated to caring for those in need while promoting human development, collaboration, and the elimination of poverty and injustice. We strive to empower those served to transform their lives in the spirit of God's love and compassion.

Intent

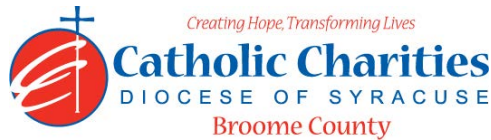
CATHOLIC CHARITIES OF BROOME COUNTY's Standards of Conduct (the Standards) apply to all Affected Individuals. For purposes of this Policy, the term "**Affected Individuals**" includes all persons who are affected by the required Catholic Charities of Broome County's risk areas including all employees; the Executive Director and other senior administrators; managers/supervisors; volunteers; contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.

The Standards of Conduct were approved by **CATHOLIC CHARITIES OF BROOME COUNTY's** Board of Directors. This document is a formal statement of the Catholic Charities of Broome County's commitment to the standards and rules of ethical conduct.

CATHOLIC CHARITIES OF BROOME COUNTY is committed to compliance with all applicable Federal and State laws and the prevention of unethical, improper or unlawful behavior or acts in the delivery and billing of services, and prevention and detection of fraud, waste and abuse. **CATHOLIC CHARITIES OF BROOME COUNTY** is committed to stopping such behavior as soon as possible after discovery, and to discipline those persons involved in such behavior or acts, including those who fail to report a violation.

All Affected Individuals, as defined above, must comply with the Standards of Conduct, immediately report any alleged violations of wrongdoing, and assist Management and the Compliance Officer in investigating allegations of wrongdoing.

While the standards addressed in this document are intended to guide Affected Individuals in their daily responsibilities, they do not replace any **CATHOLIC CHARITIES OF BROOME COUNTY** policies and procedures. There may be instances not addressed by the Standards of Conduct or existing policies and procedures, or there may be activities that seem to conflict with the Standards. Affected Individuals must seek direction from their supervisor, other Management staff, or the Compliance Officer in these instances.



Ethics

It is the policy of **CATHOLIC CHARITIES OF BROOME COUNTY** to comply with all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all Affected Individuals must obey the laws and regulations that govern their work and always act in the best interest of those who receive services and their families (collectively referred to as service recipients) and Catholic Charities of Broome County.

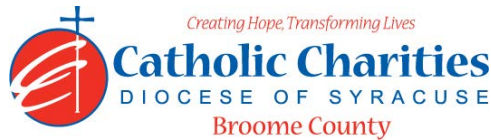
Guidelines for Affected Individuals: Ethics

- You are expected to keep Management staff informed of what you are doing; to document or record all services or transactions accurately; and to be honest and forthcoming with Catholic Charities of Broome County, regulatory agencies, and internal and external auditors.
- You are expected to comply with Catholic Charities of Broome County's policies and procedures, accounting rules, and internal controls.
- You are expected to function with honesty in your work for Catholic Charities of Broome County and with service recipients, other providers, suppliers, and all others with whom Catholic Charities of Broome County does business.

Conflict of Interest

For purposes of this section on conflict of interest, an immediate family member is any person who is related by blood or marriage, or whose relationship with the Affected Individual is similar to that of persons who are related by blood or marriage. An immediate family member of a person includes:

- The person's spouse;
- Natural or adoptive parent, child, or sibling;
- Stepparent, stepchild, stepbrother, or stepsister;
- Father-in-law, mother-in-law; son-in-law; daughter-in-law; brother-in-law; or sister-in-law;
- Grandparent or grandchild; and
- Spouse of a grandparent or grandchild.



Affected Individuals may not engage in any conduct that conflicts – or is perceived to conflict – with the best interest of Catholic Charities of Broome County. You must not allow any outside financial interest or competing personal interest to influence your decisions or actions taken on behalf of the Catholic Charities of Broome County. This means that you or your immediate family should not personally benefit from doing business with Catholic Charities of Broome County, should not have independent relationships with those who deal with Catholic Charities of Broome County, should not use Catholic Charities of Broome County property for personal benefit, and should not compete with the Catholic Charities of Broome County.

You must avoid any situation where a conflict of interest exists or might appear between your personal interests or those of your family and the interest of Catholic Charities of Broome County. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

Affected Individuals must disclose any circumstances where the employee or their immediate family member is an employee, consultant, owner, contractor, or investor in any entity that (i) engages in any business or maintains any relationship with Catholic Charities of Broome County; (ii) provides to, or receives from, Catholic Charities of Broome County any referrals of service recipients; or (iii) competes with Catholic Charities of Broome County.

If you have a potential conflict, you must make full disclosure to the Compliance Officer, members of Management and the Board, as appropriate. You will be provided with actions that may be necessary to address or prevent conflict of interest.

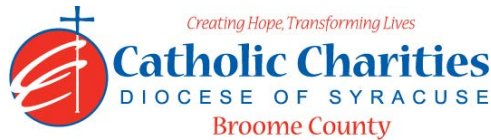
Guidelines for Affected Individuals: Conflict of Interest

It is a conflict of interest for you to personally take for yourself opportunities that are discovered through the use of Catholic Charities of Broome County's property, information, or your position with Catholic Charities of Broome County; to use Catholic Charities of Broome County's property or information for personal gain; or to compete with the Catholic Charities of Broome County.

There are many types of situations where potential conflicts may arise. You must promptly report any actual or potential conflict of interest to your immediate supervisor or directly to the Compliance Officer.

Outside Activities and Employment

- You may not conduct outside activities during work time. Such activities interfere with your regular duties and negatively impact the quality of your work.
- You are a representative of Catholic Charities of Broome County in your everyday life and must represent Catholic Charities of Broome County positively in the community.



- Outside employment must not conflict in any way with your responsibilities to Catholic Charities of Broome County or its service recipients. You may not compete against CATHOLIC CHARITIES OF BROOME COUNTY, or have any ownership interest in a competitor.

Use of Catholic Charities of Broome County Funds and Resources

- Catholic Charities of Broome County's assets are to only be used for the benefit of Catholic Charities of Broome County and its service recipients. Assets include not only funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about service recipients, financial information, computer property rights, and other business information about Catholic Charities of Broome County.
- You may not use Catholic Charities of Broome County assets for personal gain or give them to any other persons or entities, except in the ordinary course of business as part of an approved transaction.
- Property and resources of Catholic Charities of Broome County should only be used for the benefit of Catholic Charities of Broome County or its service recipients.

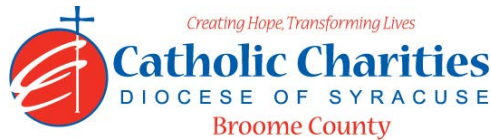
Maintenance of Records

Employees, Volunteers and independent contractors must record and report all information related to **CATHOLIC CHARITIES OF BROOME COUNTY** and its operations, its service recipients, and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the service recipients, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims, payment records, correspondence, and any other method of communication. Employees, Volunteers and independent contractors must not omit or conceal any relevant information.

Guidelines for Employees, Volunteers and Independent Contractors: Recordkeeping

Many of Catholic Charities of Broome County forms are legal documents used to prove that a service was provided, to bill for a service, to record a job task, or to record specific happenings. You must document accurately and honestly, and only for those services that you provided or those events in which you were involved.

Employees, Volunteers and independent contractors are expected to maintain complete, accurate, and contemporaneous (timely) records as required by the Catholic Charities of Broome County. The term "records" includes all documents, both written and electronic, that relate to the provision of **CATHOLIC CHARITIES OF BROOME COUNTY** services or provide support for the billing of **CATHOLIC CHARITIES OF BROOME COUNTY** services. Records must reflect the actual service provided.



Falsification of Records

- You must not make any false entries in any of Catholic Charities of Broome County's records or in any public record for any reason.
- You may not alter any permanent entries in Catholic Charities of Broome County's records. Any records to be appropriately altered must reflect the date of the alteration, the name, signature, and title of the person altering the document, and the reason for the alteration, if not apparent.
- You may not sign the name of another person to any document.
- Signature stamps may not be used.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.
- Backdating and predating documents is unacceptable.

Expense Records

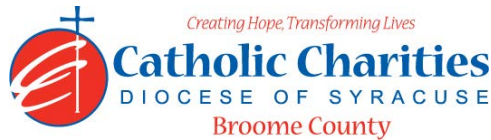
- You must always charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project, contract, or the budget status of a particular account or line item.

Retention of Records

- The retention, disposal, or destruction of records of or pertaining to the Catholic Charities of Broome County must always comply with legal and regulatory requirements and **CATHOLIC CHARITIES OF BROOME COUNTY** policy.
- You may not destroy records pertaining to any legal action or government investigations or audit without written approval of the Compliance Officer.

Protection of Confidential Information

During your employment, contract, or association with Catholic Charities of Broome County, you may acquire confidential information about **CATHOLIC CHARITIES OF BROOME COUNTY**, its staff, and service recipients which must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, employee, and service recipient information is very important. Violations may result in fines and penalties, legal action, or criminal charges.



Catholic Charities of Broome County has developed policies and procedures to assure that the confidentiality of **CATHOLIC CHARITIES OF BROOME COUNTY** information and information about service recipients is protected and released only with the appropriate authorization or for lawful reasons. All Affected Individuals are required to comply with **CATHOLIC CHARITIES OF BROOME COUNTY**'s Privacy and Security Policies. If you have any questions concerning confidential information or the Privacy and Security Policies, contact your immediate supervisor or the Compliance Officer.

Guidelines for Affected Individuals: Confidentiality

You must treat all of Catholic Charities of Broome County's records and information as confidential.

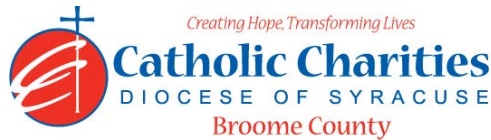
You may not release confidential information without the proper authorization. Confidential information includes not only information about service recipients and their families, but also non-public information about Catholic Charities of Broome County that may be of use to Catholic Charities of Broome County's competitors or harmful to Catholic Charities of Broome County or its service recipients if released.

You must protect Catholic Charities of Broome County's information and avoid discussing or disclosing Catholic Charities of Broome County's information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside Catholic Charities of Broome County. Furthermore, staff may not share confidential information about Catholic Charities of Broome County with anyone, except where required for a legitimate business purpose. Ask your supervisor if you are not sure whether certain information is confidential.

Catholic Charities of Broome County's information may not be removed from Catholic Charities of Broome County's property without permission from a supervisor or administrator with proper authority over the information.

Termination of Employment or Contract

- You may not use any confidential information gained from your employment or contract with Catholic Charities of Broome County for your benefit or another organization's benefit. You may not take copies of any reports, documents, or any other property belonging to Catholic Charities of Broome County.
- Upon termination of employment or contract with Catholic Charities of Broome County, you must return all of Catholic Charities of Broome County's property including, but not limited to, copies of documents, notes, and other records containing confidential information; computer disks; your ID and keys/fobs; and credit cards.



Information Security

Guidelines for Affected Individuals: Information Security and Technology

- You are responsible for properly using information stored and produced by all Catholic Charities of Broome County's computer systems.
- Computers, internet access, email, or other office communication systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing, or harmful to others.
- Do not share your system username or password with another person or allow another to access the computer with your password or log-on information.
- All Affected Individuals are required to comply with **CATHOLIC CHARITIES OF BROOME COUNTY's** Privacy and Security Policies. If you have any questions concerning information security, contact your immediate supervisor or Compliance Officer.

Fair Dealing

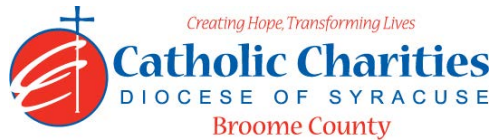
Business Dealings and Referrals

CATHOLIC CHARITIES OF BROOME COUNTY will not be inappropriately influenced with goods or services from any business in which Affected Individuals and their immediate family members have a substantial interest.

Conducting business with providers, contractors, suppliers, service recipients, and competitors may pose ethical, and sometimes legal, problems. Affected Individuals are expected to deal fairly with providers, contractors, service recipients and competitors.

As defined in the Conflict of Interest Policy, and for purposes of these Standards of Conduct, an immediate family member is any person who is related by blood or marriage, or whose relationship with the Affected Individual is similar to that of persons who are related by blood or marriage. An immediate family member of a person includes:

- The person's spouse;
- Natural or adoptive parent, child, or sibling;
- Stepparent, stepchild, stepbrother, or stepsister;
- Father-in-law, mother-in-law; son-in-law; daughter-in-law; brother-in-law; or sister-in-law;
- Grandparent or grandchild; and
- Spouse of a grandparent or grandchild.



Guidelines for Affected Individuals: Fair Dealing

The Standards of Conduct and the following guidelines are intended to help you make appropriate, responsible, and correct decisions in these and all matters:

Kickbacks and Rebate

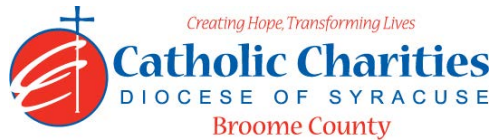
- Kickbacks and rebates in cash, credit, or other forms are prohibited. They are not only unethical, but also in many cases illegal.

Gifts and Gratuities and Entertainment

- Affected Individuals may not without permission of the Compliance Officer accept, solicit, or offer anything of value from anyone doing business with Catholic Charities of Broome County.
- Under no circumstances may an employee or immediate family member of an employee accept a cash gift or gratuity from a service recipient, a family member or friend of a service recipient, or a vendor or potential vendor. Any Affected Individual who gives or accepts such a cash gift or gratuity will be subject to disciplinary action, including termination of contract, assignment or engagement with **CATHOLIC CHARITIES OF BROOME COUNTY**.
- You may not solicit money, gifts, gratuity, or any other personal benefits or favors of any kind from providers, contractors, accounts, or service recipients and their families.
- You must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.
- Affected Individuals may only accept unsolicited, non-monetary gifts (e.g., candy during the holiday season) from a service recipient or business partner, so long as the gifts are of nominal value and do not obligate the employee to take, or refrain from taking, an action or decision on behalf of a service recipient or Catholic Charities of Broome County. Affected Individuals may not accept gifts in excess of \$25.00 in value or favors from service recipients or their families in recognition of their service without the prior approval of the Corporate Compliance Officer. Affected Individuals should discourage the giving of gifts as tactfully as possible. If individuals wish to express their appreciation, an Affected Individual may suggest a contribution to their program and if possible, Affected Individuals are encouraged to make any nominal gifts received available to service recipients and/or specific Catholic Charities of Broome County programs.

Agreements with Contractors and Vendors

Catholic Charities of Broome County must ensure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards and the applicable compensation, if any, must be reasonable in amount,



not be excessive in terms of industry practice, and must equal the value of the service(s) rendered or items purchased.

Improper Use of Funds or Assets

Use of the Catholic Charities of Broome County's funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor or the Compliance Officer.

You may only approve payments or receipts on behalf of the Catholic Charities of Broome County that are described in documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on the Catholic Charities of Broome County's books, are strictly prohibited.

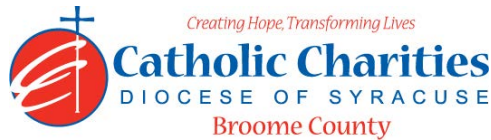
Federal and State Programs

CATHOLIC CHARITIES OF BROOME COUNTY is committed to complying with the laws and regulations that govern the Federal and State programs that it administers. The Compliance Program, these Standards of Conduct, and policies and procedures are developed to provide guidance in your day-to-day work and activities you perform on behalf of the Catholic Charities of Broome County. You must abide by the policies and procedures and the Standards set by the Catholic Charities of Broome County.

CATHOLIC CHARITIES OF BROOME COUNTY's programs and services are largely funded by Federal and State healthcare programs, including Medicaid and Medicare. **CATHOLIC CHARITIES OF BROOME COUNTY** is committed to full compliance with all Federal and State healthcare program requirements. **CATHOLIC CHARITIES OF BROOME COUNTY** must also comply with laws and regulations designed to combat fraud, waste, and abuse and the submission of inaccurate or false claims.

CATHOLIC CHARITIES OF BROOME COUNTY has put in place procedures and practices to ensure that:

- All service documentation, records, and reports are prepared timely, accurately, and honestly;
- All documentation supporting claims for service is complete and maintained in accordance with regulatory requirements and Catholic Charities of Broome County's policies;
- All claims submitted to any government or private healthcare program are accurate and comply with all Federal and State laws and regulations and payer requirements;
- Claims are only submitted for medically necessary services provided by eligible providers;
- All claims are properly documented and accurately coded; and
- Billing errors are promptly identified and any payments received in error are promptly returned to the payer.



Employees and independent contractors responsible for the documentation, charging, coding, billing, and accounting of services must comply with all applicable State and Federal regulations and **CATHOLIC CHARITIES OF BROOME COUNTY** policies and procedures.

It is against the law and **CATHOLIC CHARITIES OF BROOME COUNTY**'s policies to knowingly or carelessly submit a false claim. Submitting a false claim includes using false records, using the wrong code, double billing, or billing or causing to be billed services that are not provided or fully documented, and billing for services that are not medically necessary.

All Affected Individuals have a responsibility to notify the Compliance Officer promptly if they are charged with a criminal offense related to healthcare or are proposed or found to be subject to exclusion from Federal or State healthcare programs.

Governmental Investigations

There may be times that Catholic Charities of Broome County is asked to cooperate with an investigation by a Federal or State governmental agency, or to respond to a request for information. A request may be formally addressed to Catholic Charities of Broome County or to an individual employed by or associated with the Catholic Charities of Broome County. All Affected Individuals must report any requests for information or cooperation with an investigation to the Executive Director and Compliance Officer immediately.

Employment Environment

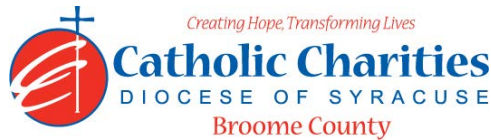
CATHOLIC CHARITIES OF BROOME COUNTY is committed to creating a safe and professional workplace where employees and others are treated with respect and without regard to their race, color, creed, religion, sex, national origin, age, disability, marital status, citizenship, veteran's status, sexual orientation, gender identity, predisposing genetic characteristics, domestic violence victim status, reproductive health decisions, or any other legally protected status. Business integrity, teamwork, trust, and respect are Catholic Charities of Broome County's most important values. Unlawful discrimination or harassment of any sort violates these values. All Affected Individuals must exhibit and promote respect, integrity, trust, and teamwork in the workplace and must comply with Catholic Charities of Broome County's policies prohibiting discrimination and harassment in all facets of the Catholic Charities of Broome County's work.

All Affected Individuals are required to support Catholic Charities of Broome County's commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace.

All Affected Individuals are prohibited from joking about another person's race, color, creed, religion, sex, national origin, age, disability, marital status, citizenship, veteran's status, sexual orientation, gender identity, predisposing genetic characteristics, domestic violence victim status, reproductive health decisions, or any other legally protected status.

All employees are prohibited from considering someone's race, color, creed, religion, sex, national origin, age, disability, marital status, citizenship, veteran's status, sexual orientation, gender identity, predisposing genetic characteristics, domestic violence victim status, reproductive health

Standards of Conduct
Issue Date: 03/28/2023
Effective Date: 03/28/2023
Revision Date:



decisions, or any other legally protected status in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits, and other work terms.

Sexual harassment is prohibited. Sexual harassment includes any form of unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual or sex-based nature.

Affected Individuals are responsible for understanding Catholic Charities of Broome County's policy prohibiting discrimination and sexual harassment. You should consult with an appropriate Supervisor, Manager, Director or Human Resources if you have questions about your right to a workplace free from unlawful harassment or discrimination or if you have questions about your duty to avoid discrimination.

Seeking Guidance and Reporting Violations

All Affected Individuals must report any suspected fraud, waste, and abuse; illegal or unethical acts; actual or suspected violations of Federal or State laws and regulations; actual or suspected violations of the Standards of Conduct, The Code of Ethics, the Compliance Program and **CATHOLIC CHARITIES OF BROOME COUNTY**'s policies and procedures; improper acts in the delivery or billing of services; and other wrongdoing (collectively referred to as "compliance concerns") to their immediate Supervisor, Manager, Director, Deputy Director, Executive Director, Compliance Committee member or the Compliance Officer. A Compliance Hotline is also available for confidential or anonymous reporting of such issues. The Compliance Hotline number is (866) 460-2024.

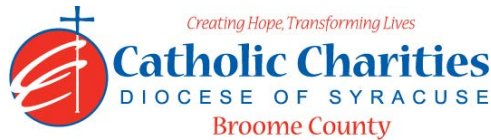
When actual or suspected noncompliance is reported to any Affected Individual, it must be promptly referred to the Compliance Officer. Steps will be taken to protect the confidentiality and anonymity of the reporters. Catholic Charities of Broome County will not tolerate any form of retaliation or intimidation against a person who makes a good-faith report in accordance with the Standards of Conduct and its Compliance Program.

All Affected Individuals must cooperate fully and honestly in any investigation into reported noncompliance.

Corrective Action and/or Discipline

Affected Individuals found to have engaged in non-compliant activity or wrongdoing addressed in these Standards of Conduct will be subject to appropriate disciplinary action, up to and including termination of employment, contract, assignment, or association with **CATHOLIC CHARITIES OF BROOME COUNTY**.

Affected Individuals who knowingly fail to report compliance concerns are subject to appropriate disciplinary action, up to and including termination of employment, contract, assignment, or association with Catholic Charities of Broome County.



Employees may face disciplinary action ranging from a verbal warning to suspension or termination, depending on the incident and the relevant surrounding circumstances. A more significant level of discipline will be taken for intentional or reckless behavior.

Your Responsibilities

- ✓ Attend required training, and read and understand **CATHOLIC CHARITIES OF BROOME COUNTY**'s Compliance Plan, Code of Ethics, Compliance Program Policies and Procedures, and Standards of Conduct.
- ✓ Follow **CATHOLIC CHARITIES OF BROOME COUNTY**'s Standards of Conduct and Code of Ethics, and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.
- ✓ Be alert to any situation that could violate **CATHOLIC CHARITIES OF BROOME COUNTY**'s Standards of Conduct, Code of Ethics, Compliance Program, policies and procedures, guidelines, and/or Federal and State laws and regulations.
- ✓ Promptly report any questions, issues, compliance concerns, wrongdoing, violations, or suspected violations to your Supervisor, Manager, Director, Deputy Director, Executive Director, a member of the Compliance Committee, or the Compliance Officer.