

Our Responsibilities as Employees

One purpose of our Code of Conduct is to provide the Haven Behavioral Healthcare family the opportunity to acknowledge the responsibilities each one of us share. Our primary responsibility is to provide ethical and effective behavioral healthcare services for our patients. We have a responsibility to treat each other with dignity and professional respect. This is also true of how we should interact with others outside our family, such as our business and clinical partners, investors, government agencies and our communities.

Another important purpose of our Code of Conduct is to clearly communicate Haven's adherence to ethical healthcare and business practices. Each member of the Haven family is personally responsible for conducting themselves in accordance with the Code of Conduct and all Company policies. We are *all* responsible for ensuring that our fellow employees are living by our Code of Conduct. *Anyone* who has knowledge or suspects that someone is in potential violation of the Code is responsible to ACT.

Take ACTION

How should you take action? First, talk with your manager, or if you feel you can't, talk with another manager or a director, local human resources, Compliance Liaison, Patient Advocate or the Chief Compliance Officer. Another resource is the **ACTion Line** at **800 961-4275**.

An outside company answers the ACTion Line with live intake operators 24/7. You can call anonymously and confidentiality will be maintained to the extent permissible under the law. Haven ***prohibits any retaliation*** against an employee who comes forward with a concern under the Compliance & Ethics Program.

Our Responsibilities as Managers, Senior Leaders, and the Board of Directors.

Anyone acting in the role of a supervisor, manager, officer or Board Director has a greater level of responsibility to follow and enforce our Compliance & Ethics Program. We each must be daily examples of the integrity and ethics we espouse in our Code of Conduct and the Compliance & Ethics Program. We must be available to answer questions our employees may have regarding the Code and we must lead by example. Perhaps most important, none of us should ever take any retaliatory action against an employee who has raised compliance or ethics concerns. We require our employees to raise any concerns they have under our Compliance & Ethics Program and nothing should ever

be said or done to indicate displeasure or concern because an employee has come forward. *Haven will not tolerate retaliation of any kind.*

Care for our Patients’

Quality of Care

Our quality of patient care is at the heart of why we exist. Haven is devoted to providing the highest level of quality care each day for our patients. We believe quality of care is how we differentiate ourselves from others in the Behavioral Healthcare profession. We must strive to always consider our patients’ care and treatment first.

While there are many methods to measure the quality of patient care, the true measure is the standard we hold ourselves and each other to meet every day. We must always aim high and strive to improve where and when needed. Ultimately, we must remember why we are in the profession we are in. That is, to provide the best specialty behavioral health services possible for our patients.

Rights and Confidentiality

We should never make any distinction in the availability of our services to anyone who is within our program’s capacity on the basis of their race, color, gender, age, religion, national origin, sexual orientation, or disability. We are in the profession of healing and distinctions made on these demographic differences will not be tolerated. We live in a diverse society and Haven believes it must strive to be a responsible, forward looking member of our society. We should also be mindful of cultural differences we may find amongst our patients and take every possible step to accommodate our patients to provide a warm and caring environment.

One of our most critical responsibilities for a behavioral healthcare professional is to protect our patients’ confidentiality. No other healthcare service demands a higher level of confidentiality than behavioral healthcare. Our patients’ confidentiality is protected under federal and state laws, regulations and professional practice standards. Most of all, our patients and their families rely upon and trust us to protect their confidentiality. We must never violate this trust. Any release of patient information must follow all appropriate guidelines and policies. If you become aware of any unauthorized release of patient information, you must immediately notify the facility’s Compliance Liaison. **IF YOU ARE IN DOUBT, ASK YOUR SUPERVISOR BEFORE YOU RELEASE ANY PATIENT INFORMATION.**

Safety and Emergency Treatment

Our patient safety is of utmost importance. Our patients and their families should never have any concern regarding their safety when in our care. If any staff member has any concerns regarding patient or visitor safety, you should take immediate action. Disclose your concerns to a supervisor or if necessary, take appropriate steps to remedy the immediate safety concern. You are obligated to report to your supervisor any breaches or potential breaches in our patient safety policies and guidelines.

Haven follows the Emergency Medical Treatment and Active Labor Act (“EMTALA”) in providing emergency medical screening and necessary stabilization to all patients regardless of their ability to pay. If we have the capacity and capability, anyone with an emergency medical condition will be treated. In an emergency situation, we will not delay treatment to seek financial or demographic information. We do not admit, discharge, or transfer patients with emergency medical conditions based exclusively on their ability to pay.

Care for our Employees

EEO and Diversity

Haven is an equal opportunity employer. We do not make any employment related decisions based upon a person’s race, color, gender, age, religion, national origin, sexual orientation, or disability. We believe that one of our Country’s strength is our diverse culture and Haven will strive to employ a diverse workforce that reflects the qualified labor pool of the local community.

Non-Harassment and Workplace Violence

Every Haven employee is entitled to a workplace free from any form of harassment. Haven will not tolerate harassment of any kind, whether sexual in nature, a physical threat through speech or conduct, or through conduct that is disrespectful of another person’s feelings. No Haven employee should tolerate any form of harassment and should immediately report any concerns regarding harassment they may have for themselves or others to a supervisor, Human Resources, Compliance Liaison or the ACTION Line. Our prohibition against harassment applies to anyone who interacts with our employees, including fellow employees, Physicians, vendors, patients and their visitors.

While there are inherent safety risks in our profession, Haven is committed to providing a violence free workplace for all its’ employees. Violence directed at our staff members is prohibited and will not be

tolerated. If a patient initiates violent behavior towards our staff, appropriate clinical safety protocols must be followed and any injuries which occur as a result of such an incident must be reported immediately to your supervisor.

Confidentiality

There may be times when you are accorded access to employee information as part of your duties. This information is confidential and you are obligated to protect the confidentiality of the information. Disclosure of confidential employee information, such as compensation rates, is strictly prohibited unless necessary to perform your duties. This obligation of confidentiality is especially true if one of our employees is receiving treatment at one of our facilities or from one of our medical staff members.

Professional Licenses

Employees, independent contractors, and credentialed practitioners in positions that require professional licensure, certifications, or other credentials are responsible for maintaining current status on their respective professional licenses, certifications, and credentials under applicable federal and state laws. No individual should be permitted to work at or in affiliation with a Haven facility without the current and valid license, certification, or credentials applicable for the position.

Health and Safety

Alcohol & Illegal Substances

Employees shall not report to work under the influence of alcohol, an illegal substance, or any other substance that may impair their ability to provide safe patient care. The unauthorized use, possession, sale, or purchase of alcohol, drugs, or illegal substances on Haven property is strictly prohibited. Any employee found in violation of this rule may be subject to discipline up to and including termination of employment.

Safe Practices, Policies and Protocols

Due to the nature of our profession, it is essential Haven's safety practices, policies, and protocols are adhered to at all times. These safeguards are designed not only to comply with applicable federal and state laws, but for the protection of our patients and employees. Anyone who observes a violation of any safety related practice, policy, or protocol should immediately report the incident to a supervisor and when appropriate, take immediate action to ensure the safety of our patients and staff members.

Care for our Business and Clinical Partners

Conflict of Interest

A Haven employee must never allow a conflict of interest to interfere with performing their duties in the best interest of Haven, our mission and patients. A conflict of interest may arise because of a personal, financial, or professional relationship with a person or entity outside of Haven. Any time a potential conflict of interest arises, it is your obligation to disclose the potential conflict to either your supervisor, Human Resources or the Compliance Liaison.

Some potential scenarios that may result in a conflict of interest include:

- ❖ Financial opportunities such as loans, contracts or jobs for ourselves or family members if they are offered as a result of our position with Haven.
- ❖ The use of Haven property, information, business relationships or job position for personal or family gain.
- ❖ Competing with Haven or providing proprietary or confidential information to a Haven competitor.
- ❖ Employees whose family members work for or consult with a supplier, payer, or competitor of Haven must disclose that relationship to Human Resources.
- ❖ Outside employment opportunities that conflict with your duties for Haven.

Payers

The payers who provide payment to Haven for our services are our business partners whether they are government, commercial or private in nature. It is essential that all billing policies and procedures are implemented and adhered to ensure accurate and appropriate billing for our services. No employee should ever knowingly submit, or cause to be submitted, for payment any bill that does not accurately reflect the services actually rendered to the patient in question. Further, no employee should ever knowingly submit, or cause to be submitted, for payment any bill that does not conform to the applicable laws, regulations, or contractual obligations for payment for the services in question. Inaccurate or incomplete billing may result in allegations of fraudulent conduct by you and Haven. **IF YOU ARE EVER IN DOUBT, ASK BEFORE YOU RECORD THE CHARGE OR PROCESS THE BILL.**

Physicians and Referral Sources

Federal and state laws regulate the relationship between hospitals and physicians and other credentialed healthcare providers who refer patients

to the hospital. The Federal Anti-Kickback and Stark statutes are two examples of the many laws and regulations that place limits and prohibitions on our relationship with referral sources such as our credentialed Psychiatrists and Psychologists. It is essential both Haven and its' referral sources understand the legal prohibitions to avoid any appearance of violating these various statutes and regulations. For example, payments to referral sources for professional services rendered and payments from referral sources for services or rent are perfectly legal if the business arrangement is properly structured and documented.

Properly structuring a business relationship with a referral source, however, is only one part of our obligation. The accurate administration of the business relationship once it is implemented is even more critical. No Haven employee should ever ignore, modify, or take any action, or inaction, which is inconsistent with a written agreement with another party, especially if that party is either a referral source or potential referral source for the hospital or a licensed physician.

While there are many nuances to the laws that oversee our relationship with referral sources, the two primary principles to always remember are:

- **We do not pay for referrals.** We accept patient referrals and admissions based on clinical protocols and our ability to provide the medically necessary services. No payment should ever be made to a referral source for the referral of a patient. If a referral source ever solicits payment, you are obligated to disclose our prohibition against such a payment and immediately report the solicitation to your Compliance Liaison.
- **We do not solicit or accept payments for referrals.** Haven employees must never solicit or accept anything of value in exchange for making a referral to a healthcare provider. We also do not take into account past or future referrals Haven has or may receive from the referral source in making our referral. Referral decisions should be based on clinical criteria and our knowledge of the potential provider's expertise.

[Purchasing and Supplier Relations](#)

When purchasing supplies or services on behalf of Haven, we should always remember it is our duty to obtain the best deal possible for Haven. Our decisions should be made on legitimate criteria such as the suitability of the services or products, price, and the quality of services or products. We should never allow personal relationships with a current or potential vendor to play a factor in our purchasing decisions. When seeking competitive bids, we should never disclose competing bids to a

vendor which would place that vendor in a superior bidding position to the other competing vendors.

- Any personal or family relationship with a current or potential vendor creates a conflict of interest for you. You are **required** to disclose this conflict of interest to your supervisor **before** making any purchasing decision.

Gifts and Entertainment

Gifts and entertainment are appropriate in a business environment, but should never impair your judgment. When accepting a gift or entertainment from a current or potential vendor, use common sense as to whether to accept the offer or gift. You should assess the relative value of the gift or entertainment, the frequency of gifts or entertainment, and the timing of the gift or entertainment. For example, if the value is greater than \$100, you should seek advice from a supervisor, Compliance Liaison or the ACTion Line before accepting. Likewise, if the gift is offered as part of a bidding process, the timing of the gift would be inappropriate as opposed to a gift given during the holiday season.

Gifts or entertainment of current or potential referral sources should be limited in value and frequency. Appropriate guidelines for such gifts or entertainment should be sought from corporate level officers such as Haven's President or CFO. Gifts or entertainment must never be given for referrals or to induce referrals.

Care for our Investors

Conflict of Interest

Every one of us at Haven has a duty to protect Haven's business interest and the interest of Haven's investors. Haven would not exist without the commitment and resources we receive from our investors. As such, you must be certain to avoid, and if not possible, disclose any potential conflict of interest. For example, ownership in a competing entity is a conflict of interest and must be disclosed to Haven's CEO unless your ownership consists of stock ownership in a publicly traded company and your ownership interest does not exceed 1% of the company's outstanding common shares.

Non-Competition

You should never enter into a business or professional relationship that places you in competition with Haven. A competitor is any entity who provides behavioral healthcare services either within a 50 mile radius of

an existing Haven facility, or if they receive referrals on a nationwide basis similar to Haven's military program.

In the case of clinical professionals, you should disclose any additional working arrangements you may have to your supervisor to determine if Haven has a concern with you working at a competing behavioral healthcare provider.

Proprietary Information and Company Records

Haven's proprietary information is critical to our success in meeting our mission. Each of us must take every step necessary to protect this information. What is proprietary information? It is our patient, employee and medical staff records, our clinical programs and protocols, financial and billing records, internal policies and procedures, business and marketing plans, referral sources, payer contracts, and other sensitive non-public information. No one should ever disclose or permit access to Haven's proprietary information unless there is a legitimate internal business or clinical need for the information. You should immediately report any inappropriate disclosure or suspected disclosure of proprietary information to your Compliance Liaison, corporate officer or the ACTion Line.

Haven's company records, reports, charts and documents must always be accurate, truthful and complete. We must be certain to document accurately our services provided, patient interactions, and all financial records and transactions. To the outside world, our word is only as good as the documents we have to support our actions. You should always remember the adage "if it's not written down, it didn't happen."

Electronic Communications

Today we rely more and more upon electronic communications through e-mail, text messages, telephones and wireless devices. The electronic communication devices and systems Haven provides you are for Company use. While some limited personal use is understandable, these electronic communication devices belong to Haven and can be subject to monitoring. No one should ever assume their electronic communications on Company owned devices or systems are private.

Likewise, when you are utilizing electronic communications such as e-mail for business or clinical purposes, realize the communications may later be sought or viewed as part of an external process such as a payer audit, government review, or third party legal action. You should always be mindful that any communications should be truthful, complete, accurate and professional in tone.

Care for our Reputation

Laws and Regulations

You are only as good as your reputation. In the professional healthcare services, we must live by this adage. There is no quicker way to damage or ruin your reputation as a caring professional healthcare provider than to willingly, or unwillingly, violate the laws and regulations that regulate our industry. Haven is committed to complying with all federal, state and local laws, regulations, rules and ordinances that regulate behavioral healthcare. Some of these laws, such as the Anti-Kickback Statute, Stark, False Claims Act, and professional licensing regulations, not only can result in large monetary penalties for Haven, but can also result in criminal prosecution for you and other co-workers. It is critical to understand how these laws pertain to your job as a professional healthcare provider and to avoid any appearance of violating these laws.

- The Anti-Kickback Statute prohibits soliciting or accepting something of value in exchange for actual or potential referrals. Both civil and criminal penalties may result for both Haven and the individuals involved. There are specific safe harbors that permit certain types of payments to referral sources that must be carefully structured and adhered to when implemented. These safe harbor arrangements require the assistance of legal counsel and no Haven employee should ever attempt to implement a safe harbor arrangement without legal advice.
- Stark, or the physician self-referral law, prohibits referrals by a physician to an entity for designated health services if the physician or an immediate family member of the physician has a financial relationship with the entity receiving the referral. As with the Anti-Kickback Statute, there are safe harbor exceptions to these rules which require legal assistance to properly structure under the Stark law.
- Federal and State False Claims Statutes prohibit the submission of false or inaccurate claims for payment from the government. Submission of false claims can result in substantial monetary penalties for Haven and potential criminal prosecution of the individuals who submitted the claims.
- Fraud laws prohibit fraudulent conduct directed towards outside parties such as a payer, patient, business entity, or other persons. This is one of the reasons why keeping accurate, truthful and complete records is so vital. The various fraud laws are both civil and criminal in nature, so it is important to always

communicate with outside parties in an accurate and truthful manner.

- Clinical trials require strict adherence to federal and state laws that regulate the conduct of such trials. Haven may participate in clinical trials and no misconduct or inaccurate recording of actual results will be tolerated.

Government Requests and Subpoenas

It is Haven's policy to fully cooperate with any reasonable requests for information from government agencies and regulators. Before responding to any subpoena or non-routine requests, you should direct the requests to the facility CEO, Compliance Liaison or any corporate level officer. There are legal protocols to follow when responding in such cases and Haven will seek the advice of legal counsel on the appropriate method of response.

Similarly, if you or one of your employees is asked to interview with a government agent regarding their work at Haven, you should notify the corporate office to seek legal advice before agreeing to the interview. In the unlikely event of a government agent serving a search warrant at your Haven location, you should ask to review the warrant and immediately contact the corporate office. You should not in any way hinder the agents' efforts to begin their legal search as described in the warrant. Also, you should not mislead the agents in any way as to the existence of documentation or its' location.

Marketing

We use marketing and advertising activities to educate the behavioral healthcare community and the public about our treatment programs and services. Our marketing and advertising communications must always be truthful and accurate. No employee should ever use any deceptive or dishonest methods to obtain business.

Contractual Obligations

Haven enters into contracts with various business partners such as payers, vendors and behavioral healthcare professionals. It is important we meet our contractual obligations and ensure the third parties we contract with meet their contractual obligations. No payments or services should be provided if such payments or services are not included in the written contract.

Community Service and Political Activities

Haven believes it is important to be an active corporate citizen within the communities we serve. We encourage our employees to become involved in our local communities charitable organizations. Haven will consider charitable contribution requests, but meeting every request is not possible. Our charitable efforts will be consistent with our mission and related to the behavioral healthcare community.

Haven also believes in our employees' right to choose whether to be active politically in their local communities. However, no employee should attempt to impose their own political beliefs on their fellow employees or our patients. Solicitations of political contributions are prohibited unless done so through Haven's sanctioned PAC. No employee should speak on behalf of Haven on political issues unless Haven's CEO expressly authorizes him or her to do so.

Take Action

Haven Behavioral Healthcare Compliance & Ethics Program

The Haven Behavioral Healthcare Compliance & Ethics Program provides employees assistance in navigating their way through the complex regulatory environment that we practice in. The Chief Compliance Officer (CCO) oversees the program and reports directly to the Board of Directors and Haven's CEO. The ACTION Line is answered by a third party company which provides summaries of any calls to the CCO. The purpose of our Program is to educate our employees and affiliates; and to protect our patients and the reputation of Haven and our employees. All Haven employees share the obligation of complying with the Code of Conduct and our Company's policies; however, we also share the obligation to take action when we observe or suspect any violations of the Code of Conduct or Company policies.