



PINNACLE
TREATMENT CENTERS

Code of Conduct

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Our Mission

To make recovery possible by transforming lives, communities and the families we serve with treatment that works.

Our Vision

We envision a better world where lives and communities are made whole again through our comprehensive treatment of people with substance use disorder. the very best talent.



Who We Are

Pinnacle Treatment Centers is a recognized leader in comprehensive substance use services serving over 35,000 patients daily in nine states (California, Georgia, Indiana, Kentucky, New Jersey, North Carolina, Ohio, Pennsylvania, and Virginia).

With over 135 locations Pinnacle provides a full continuum of care which includes medically-monitored detoxification/withdrawal management, inpatient psychiatric & addiction stabilization program, inpatient/residential, partial hospitalization/partial care, intensive outpatient, general outpatient programming, and medication-assisted treatment.

Our Culture

We are a team of passionate, dedicated, friendly, ethical, and compassionate individuals driven by our mission to make recovery possible by transforming lives, communities and the families we serve with treatment that works. We dedicate our whole selves to pursue a vision of a better world where lives and communities are made whole again through our comprehensive treatment of people with substance use disorder.

We believe that providing excellent patient care starts from within - by taking care of the people that take care of our patients. We are proud of the collaborative, friendly, respectful work environment that we have cultivated and maintained as we have continued to grow. We strive to be an organization that our teammates are proud to be part of. By living this way, we are able to create a positive teammate experience that attracts, develops and retains the very best talent.



Letter from Michael Lawler and Kelly A. Priegnitz

Dear Colleague:

We know that you have a choice about where and how you direct your talents and abilities. We want to thank you for choosing Pinnacle Treatment Centers. The care you provide each day makes a huge difference in the lives of our patients. Compliance is at the heart of Pinnacle's values, and you are vital to maintaining our culture of compliance. Our dedication to our patients' paths to recovery is built on a foundation of doing the right thing for our patients and our employees, and we are best able to provide quality care to our patients when we operate within the guidelines that govern the services we provide. Our Code of Conduct is designed to promote our commitment to our values and provide you with guidelines to do your job in an ethical manner.

Please take a few moments to read and understand the contents of this Code of Conduct booklet. It is applicable to all aspects of our business and an essential part of our commitment to quality and customer service.

Another part of that commitment is to make sure that every employee has the ability to express any concerns or complaints without fear of reprisal. We do this in two ways. Our Open-Door Policy encourages employees to contact their immediate supervisor and, if necessary, to proceed up the chain of command to resolve problems and concerns. If this option is inappropriate or ineffective, you may also call Pinnacle's Compliance Hotline at 844-755-3399. The Hotline is confidential and has been developed to maintain the caller's anonymity up to the limits of the law.

It is important to note that there will be no retaliation or retribution against any employee who, in good faith, reports a concern to the Hotline.

We thank you for the care you provide and for doing your job in an ethical manner.

Best regards,



Michael Lawler
Chief Executive Officer



Kelly A. Priegnitz
Chief Legal and Compliance Officer

Introduction

Pinnacle is committed to helping its patients achieve their treatment goals through the provision of great quality care. At Pinnacle, we understand that everyone who walks through our doors has a specific set of challenges they face and a unique set of obstacles to overcome, and we are committed to helping each person overcome those challenges and obstacles. Pinnacle is also committed to full compliance with all federal health care program requirements, including a commitment to prepare and submit accurate claims for the services we provide.

To achieve this goal, we are driven by our commitment to our mission and our values. Our philosophy is simple: success is achieved when you focus on patients and employees.

Pinnacle's Code of Conduct (Code) describes Pinnacle's values, standards, and expectations. The Code outlines the ethics Pinnacle strives to maintain in its relationships with our patients, employees, providers and communities. We must make every effort to address any concern of non-compliance. The Code supports these efforts by promoting ethical and legal behavior across the company. The Code governs all of our conduct, and it is never acceptable for any officer, employee, or contractor to ask or to be asked to act in any manner that is not in accordance with these standards.

Like all healthcare providers, Pinnacle operates in a highly regulated business. Laws and regulations applicable to the Company are complex and include rules governing healthcare programs. The Code reviews many areas of potentially unethical and illegal behavior. Due to the breadth and complexity of the regulations under which we operate, it is not possible to list all activities that could raise compliance concerns. Therefore, we encourage anyone who has a question or concern about any potential compliance matter to consult a supervisor, manager, director, Compliance or Legal to be sure decisions made and actions taken reflect Pinnacle's values and commitment to doing the right thing.

This Code of Conduct provides support to all of Pinnacle, including its Board Members, officers, employees, and contractors, so everyone has a clear understanding of Pinnacle's commitment to act with integrity. The Code sets forth Pinnacle's expectations for acting with integrity inside and outside the workplace, the tools for reporting questions and concerns regarding integrity matters, and available resources to learn more about integrity.



Who Is Covered Under the Code of Conduct?

Pinnacle's Compliance Program

Pinnacle's Compliance Program (Program) is a comprehensive effort to promote ethical and legal behavior that is in compliance with standards of performance. While detecting and preventing fraud, waste, abuse, and policy violations are key components of our Program, Pinnacle also provides you with resources to help guide your conduct and answer your questions.

To promote compliance with laws, regulations and policies, Pinnacle has established systems, processes, and compliance committees at every level of the organization, from our facilities to the Board of Directors. The Program is administered by the Compliance Department (Department) and headed by the Chief Compliance Officer. The Chief Compliance Officer reports directly to the Board of Directors, and the Department functions independently of Pinnacle's operations. The Department's mission is to be a trusted partner in fostering integrity, transparency, accountability, and a culture of compliance that protects the reputation, mission, vision, and values of Pinnacle Treatment Centers.

Pinnacle's Compliance Program is based on the Office of Inspector General's seven elements of an effective compliance program:

- Written Standards of Conduct
- Oversight
- Training and Education
- Monitoring and Auditing
- Performance Improvement
- Reporting Mechanisms
- Internal Response and Corrective Action

What should I do if I feel that the practices in my area are in violation of the Code of Conduct?

You should report the concern to the Compliance Department or the Compliance Hotline.

All reported concerns are investigated as appropriate. An investigation may reveal that there is a need for correction, education, or clarification. The investigation may also reveal that other individuals had similar concerns and there is a need to address the matter facility/department wide.

Pinnacle appreciates an individual's willingness to uphold our mission by allowing us to address questions and concerns and implement appropriate corrective action when necessary.

Questions and Concerns

Your Obligation to Report

Reporting your concerns is an important part of the effectiveness of Pinnacle's Compliance Program. You have the right to use Pinnacle's Disclosure Program to report your concerns or have your questions addressed regarding Pinnacle's policies or practices. You are required to report – through one of the ways listed below – any activities you suspect:

- are harmful to a patient, staff member or visitor
- are illegal or unethical
- violate any state or federal health care program requirements; and/or
- violate the Code of Conduct, the Pinnacle employee handbook, or any Pinnacle policy or procedure

It is not acceptable to overlook actual or potential wrongdoing.

How to Report a Concern

Concerns, complaints and potential violations of the Code or other Company policies may be reported to the Chief Compliance Officer or to the Compliance Department in various ways:

- **By mail, send to:**
Pinnacle Treatment Centers
1317 Route 73, Suite 200
Mt. Laurel, NJ 08054
Attn: Chief Compliance Officer
- **By email:** PinnacleConfidentialHotline@pinnacle-treatment.com
- **By phone:** call the Compliance Hotline at 844.755.3399
- **By webform:** pinnacle-treatment-hotline.com
- **By reporting the concern directly:** to the Chief Compliance Officer or to a member of the Compliance Department.

Pinnacle's Compliance Hotline is available 24 hours a day, 365 days a year. An external vendor operates the Hotline, and calls are not recorded.

Regardless of how you report a concern, you may remain anonymous if you wish. To the extent possible, Pinnacle will maintain the confidentiality and anonymity of your reported concern.

All concerns reported to the Hotline are taken seriously and will be addressed to the fullest extent necessary.

Therefore, it is important to use the Hotline appropriately. Individuals who intentionally misuse the Compliance Hotline may be subject to disciplinary action.

How a Concern Is Addressed

When appropriate, you may be contacted by the investigator or designee either during or at the conclusion of the investigation to discuss the outcome. If you choose to retain your reference number and check the status of the report via the Hotline, you will be told if the report is currently open or closed. Investigative findings are not available to the Hotline representatives and will not be provided via the Hotline. In order to protect the rights of involved parties, you will not be told if any disciplinary action resulted from the call. You may witness changes, corrections or education taking place within the facility or location as a result of a reported issue.

Protection from Retaliation

Open communication of concerns regarding compliance or business ethics is important to the success of Pinnacle's Compliance Program. Retaliation, retribution, intimidation, or harassment of anyone who makes a good faith report regarding a possible violation of this Code will not be tolerated. Any supervisor, manager or employee who conducts or condones retribution, retaliation or harassment in any way will be subject to disciplinary action up to and including termination of employment.

What should I do if I feel retaliated against?

Pinnacle will not tolerate retaliation in any form. If you experience retaliation, you should report it immediately to a supervisor, to the Compliance Department, to the Legal Department or to the Compliance Hotline so it may be addressed appropriately.

Your Obligation to Cooperate

All Board Members, officers and employees are required to cooperate with internal investigations. Pinnacle prohibits destroying or altering any documents (whether written or electronic) associated with an investigation. Pinnacle prohibits lying to or misleading an investigator or obstructing an investigation by hindering collection of evidence.

Pinnacle's policy is to comply with all reasonable and lawful requests for information and documents made by government officials.

You must immediately notify the Compliance Department if a government agency or other third party is asking you for information regarding a suspected violation of law or if you learn that an agency is investigating Pinnacle.

Consequences of Non-Compliance

Failure to comply with laws and regulations can lead to serious consequences to you, your coworkers and to Pinnacle. These consequences may include termination of employment, licensure actions, individual lawsuits, government investigations and prosecutions, prison, fines against you and Pinnacle, exclusion from participating in state and federal healthcare programs, loss of credibility and loss of respect from your peers.

Because failure to comply with laws and regulations can lead to such serious consequences, disciplinary action, up to and including termination of employment, will be taken against any employee for:

- Participating in or authorizing any violation of laws, regulations, Pinnacle's Code of Conduct or Pinnacle's policies and procedures;
- Failing to report violations;
- Concealing violations;
- Refusing to cooperate with an internal investigation; or
- Threatening or retaliating against a coworker who reports a violation.

Providing Quality Care

Dedication to quality is demonstrated in our goals to understand our patients' expectations, to provide care and services in a timely and reasonable manner, to be responsive to concerns and to maintain patient rights at all times while under our care. Each patient is an individual entitled to dignity, equality, inclusion, consideration, and respect through advocacy efforts, consideration, and respect. Failure to provide the highest quality of care or to protect the rights of our patients is not tolerated at Pinnacle.

We promote ethical, innovative, professional, and compassionate care within an environment that nurtures our patients' and residents' physical, social, emotional, and spiritual needs. Patients will not be denied care or service on the basis of race,

gender, religion, creed, color, economic status, sexual orientation, age, source of payment or any other discriminatory characteristic.

Pinnacle respects the rights of patients to participate in healthcare decisions and must inform them of their rights as required by law. This includes the right to make informed decisions about their treatment, including care coordination that extends beyond a patient's level of care. Patients are provided choice about treatment options. We are committed to providing our patients with information that will promote knowledgeable decisions.

Protecting Information

Pinnacle is committed to ensuring the privacy and security of all protected health information (PHI) and personal information (PI) maintained on its patients and employees. Federal and state laws, such as the Health Insurance Portability and Accountability Act (HIPAA) and 42 CFR Part 2 protect information we maintain on our patients and employees. Pinnacle has policies and procedures to ensure information is maintained confidentially.

Patient and Resident Information

All Pinnacle officers, employees and contractors are required to maintain the confidentiality of patient and resident information. All patient and resident information, including names, social security numbers, diagnoses, treatment information and other information related to patients and residents constitutes PHI regardless of whether the information is verbal, written or electronic. You should treat information entrusted to you as you would treat your own private information.

To ensure information security, Pinnacle has implemented safeguards including:

- Encrypting Pinnacle devices containing PHI
- Requiring passwords for Pinnacle systems
- Limiting access to information to the minimum necessary based on job role
- Prohibiting unauthorized software on Pinnacle devices
- Prohibiting texting PHI

You should never:

- Take copies of medical records out of the workplace without permission
- Leave PHI unattended and in plain view (including in your vehicle)
- Post PHI on social media without patient or resident authorization

Breaches of Protected Health Information

Any unauthorized acquisition, access, use or disclosure of PHI that compromises the security or privacy of the PHI is a breach that must be appropriately addressed.

If you become aware of a breach or potential breach of any PHI or PI, you should immediately report your concern to your Privacy and Security Contact and to Pinnacle's Compliance Hotline. Pinnacle may be subject to fines and penalties for failing to respond timely and properly to breaches. The Compliance Department will ensure that all federal and state notification requirements are followed.

Examples of potential breaches include:

- Release of PHI without a signed consent that complies with federal and state requirements
- Inadvertent sharing of PHI with the wrong patient
- Misdirected faxes containing health information
- Lost or misdirected medical records
- Discussing a patient's or resident's medical condition with a person not authorized to receive the information
- Posting pictures of patients or their information on social media
- Sending emails to people who are not authorized to receive the information, such as by using the "reply all" feature.

Health Information – Care Coordination

Protecting health information of our patients as they move across the care continuum is especially important in our efforts to provide better care coordination for our patients. Patients have the right to choose their next level of care and should be provided all options. Patients and/or their legal representatives must provide written authorization

before we share their health information with Pinnacle care coordination managers.

What do I do if I accidentally send a fax containing protected health information (PHI) to the wrong number?

Any instance of misdirected PHI should be acted upon immediately. If a fax was sent to an unintended recipient, contact the individual by phone or fax to explain that the information was misdirected.

Ask the individual to shred all documents received from the facility. You should notify your facility's Executive Director. Contact and provide him or her with details of the error (subject matter, date, time, fax number used in error) and then follow steps in the potential breach of health information policy, including contacting the Compliance Hotline. Remember to report immediately as we have to meet strict state and federal reporting timeframes.

When reporting the breach to the Compliance Department or Compliance Hotline, you should be prepared to provide detailed information about what was contained in the fax so that an appropriate review can be completed. To prevent any future occurrences, regularly used fax numbers should be programmed into fax machines. PHI may be scanned and sent by email as an alternative method.



Proprietary Information

Confidential information about Pinnacle's business is a valuable asset and is intended for use only within Pinnacle. All information concerning Pinnacle's finances, operations, products, policies, customers, development plans, computer programs, marketing strategies, and related information should be treated as proprietary and confidential. This information should not be released to anyone outside of Pinnacle, such as competitors, suppliers, outside contractors or business associates, except as may be required by law.

Marketing

Healthcare marketing is subject to many state and federal regulations. Pinnacle and its employees must adhere to these regulations. Marketing materials must be vetted and approved by the Chief Legal and Compliance Officer and the Vice President of Marketing. Seek guidance from these resources before engaging in any marketing activities.

Property, Equipment and Supplies

Pinnacle resources should be used for authorized business purposes only. Pinnacle's assets, property, facilities, equipment, and supplies should be protected against loss, theft, damage, and misuse. Pinnacle is not responsible to personal property.

Employee Information

Pinnacle employee and personnel files are also confidential. Only individuals authorized by Pinnacle policy and state and federal law will have access to employee records.

Compliance with the Law

Pinnacle is reimbursed for many services rendered under federal and state programs and, as such, is subject to a variety of regulations and requirements imposed by federal and state legislation designed to combat fraud and abuse and recover losses resulting from fraudulent activity. The Company is committed to complying with all health, safety, environmental and employment laws. Company policies and procedures are written in accordance with these laws.

Preventing Fraud, Waste and Abuse

Pinnacle is committed to detecting and preventing fraud and financial waste and abuse. Pinnacle has developed and implemented policies and procedures to ensure compliance with the laws that govern our operations as a healthcare provider. In addition to written policies and procedures, Pinnacle provides regular education to employees, agents and contractors on combating fraud, waste, and abuse through general and role-based compliance training on applicable false claims laws including the federal False Claims Act and similar state laws.

The False Claims Act applies to Medicare and Medicaid program reimbursement and prohibits, among other things, billing for services not rendered; billing for undocumented services; falsifying cost reports; billing for medically unnecessary services; assigning improper codes to secure reimbursement or higher reimbursement; participating in kickbacks; and retaining an overpayment for services or items.

Violating the False Claims Act may result in civil, criminal, and administrative penalties, including monetary penalties, imprisonment, exclusion from participation in federal healthcare programs and loss of licensure.

What are fraud, waste, and abuse, and how can I identify them in my work environment?

FRAUD is a false statement made or submitted by an individual or entity that knows the statement is false and knows that the false statement could result in some otherwise unauthorized benefit to the individual or entity. These false statements could be verbal or written.

WASTE generally means overuse of services or other practices that result in unnecessary costs. In most cases, waste is not considered to be caused by reckless actions but rather misuse of resources.

ABUSE generally refers to provider, contractor or member practices that are inconsistent with sound business, financial or medical practices, and that cause unnecessary costs to the healthcare system.

Federal law and some state laws allow private citizens to file a lawsuit on behalf of the government and to share in a percentage of any monetary recovery or settlement. These laws and Pinnacle policy prohibit retaliating or discriminating against employees, agents, or contractors because of their initiation of, or participation in, a lawful false claims investigation, report, claim or proceeding. These laws also provide for certain monetary awards and equitable relief to a prevailing plaintiff, including compensation for lost wages and reinstatement to a former position.

Summaries of these laws are posted on Pinnacle's external website and on the Company's Compliance intranet page.

If you have reason to believe that an employee, agent, or contractor is engaging in false or fraudulent business practices or false or improper billing practices, you are required to immediately report that to the Compliance Hotline.

The following are examples of prohibited billing practices:

- Billing for services not provided
- Billing for medically unnecessary services
- Documenting services that are not provided
- Fraudulently coding services to achieve a higher reimbursement
- Billing for services by unlicensed or excluded individuals
- Fraudulent or false accounting/record keeping
- Unauthorized payments of money to any organization or person, including payments or wages not earned

Kickbacks, Referrals and Bribes

Under the Anti-Kickback Statute, it is a crime to knowingly and willfully offer, pay, solicit or receive anything of value (called "remuneration") to induce or reward referrals of any item or service paid under federal healthcare programs, including Medicare and Medicaid. Things of value take many forms and include kickbacks, bribes and rebates made either directly or indirectly. Prohibited conduct includes not only giving or receiving remuneration for patient and resident referrals, but also for giving or receiving remuneration in exchange for purchasing, leasing, or ordering any good or service paid for under any federal healthcare programs. Even if there are legitimate business reasons for the remuneration, if one of the reasons you receive remuneration is prohibited, there is a violation of the Anti-Kickback Statute.

To ensure compliance with the Anti-Kickback Statute, Pinnacle prohibits accepting or offering anything of value in exchange for the direct or indirect referral of patients or residents or business in return for buying services or supplies.

Some examples of kickbacks, referrals and bribes may include, but are not limited to:

- Making payments to or receiving payments from referral sources that exceed fair market value
- Providing to, or accepting from, referral sources any free or discounted goods or services
- Establishing payment arrangements with vendors, suppliers, or referral sources where reimbursement is based on the amount of volume of business rather than the value of the services provided
- Making payments or providing courtesies in exchange for referrals

The Physician Self-Referral Law, or Stark law, prohibits physicians from making Medicare and Medicaid referrals to a provider for designated health services when the physician or an immediate family member of the physician has a financial relationship with the provider. A financial relationship can mean ownership of, investment in or compensation from a provider. In addition, Pinnacle is prohibited from submitting claims

for services provided resulting from a prohibited referral. Unlike the Anti-Kickback Statute, the Stark law can be violated even if you do not have the intent to do so.

To ensure compliance with these laws, Pinnacle requires a written agreement with all referral sources and with purchasers of Pinnacle's services when Pinnacle is the referral source. Contract review by Legal or Compliance is required before agreements are finalized.

What should I do if I am unsure of whether an agreement with a contractor or a physician is appropriate or legal?

There are "safe harbors" under the Anti-Kickback Statute and "exceptions" under the Stark law that allow certain activities that could otherwise be construed as violating these statutes. If you have questions regarding a matter, you should not enter into the agreement or contract until you have verified with the Legal Department that the agreement is legal and adheres to Pinnacle standards.

Violating the Anti-Kickback Statute may lead to both civil and criminal penalties. Civil fines for violating the Anti-Kickback Statute can be up to \$50,000 for each violation. Criminal penalties include fines up to \$25,000, imprisonment up to five years, or both. In addition to other fines and penalties, you or the Company may be excluded from participating in federal healthcare programs.

Keep in mind that even if a service is not being paid under a federal healthcare program, there may be similar state and federal laws that apply to private payor patients and residents. You should contact the Legal Department if you have questions.

Gifts, Gratuities and Bribes

Pinnacle prohibits its employees from giving or receiving (or offering to give or receive) any gift (monetary or non-monetary), gratuity, or business courtesy from a vendor, contractor or potential business affiliate if the value is more than nominal and is intended to or could be construed to influence business opportunities

awarded to the vendor or contractor. Additionally, cash, gift cards or other cash equivalents are strictly prohibited regardless of the purpose of the gift.

Non-monetary gifts of nominal value, such as mugs, pens, and calendars, may be given as a token of appreciation for a business relationship; however, these gifts should not be given routinely. Gifts to physicians must be logged on a physician gift log and cannot exceed the annual statutory limit for physician gifts.

Pinnacle allows employees to attend social events with business partners in order to develop professional relationships or to discuss the services that Pinnacle provides. Attendance is acceptable as long as the event is reasonable and customary (such as a meal) and business is discussed.

Attendance at the event must not be in exchange for referrals or be a solicitation of business, and attendance at such events must be infrequent.

A vendor that I do business with offered me tickets to a professional football game. I don't plan on using them but wanted to give them to my brother. Is this okay?

No, you may not accept the gift. Although Pinnacle encourages establishing positive relationships with our business associates, accepting a gift more than nominal value, even if you don't plan to use it yourself, is strictly prohibited. Accepting such a gift, whether intended to do so or not, may create the appearance that Pinnacle will be unfairly influenced to do business or continue to do business with that particular vendor. You should thank the vendor and politely decline the offer.

Offers of gifts that may exceed nominal value must be disclosed to operations. If there are questions regarding the appropriateness of a gift, please contact the Legal Department.

Further, no employee of Pinnacle may solicit or obtain any improper personal benefit by virtue of his or her work or employment with the company. Exceptions may apply under specific laws. If you have any questions, please contact the company's Legal Department.

Gifts and Loans from Patients, Residents and Families

At Pinnacle, we help patients through difficult periods in their lives. Patients and families sometimes wish to show their appreciation for a job well done by giving gifts to their caregivers. These gestures are well intentioned but accepting these gifts could have unintended consequences. Accepting gifts from patients or families could give the impression that you are favoring the patient or giving special treatment. It could also give the impression that you are taking advantage of the patient.

Pinnacle policy prohibits receiving cash or cash equivalents from patients or family members. Pinnacle policy also prohibits accepting gifts and tips from a patient or family member regardless of amount. If a patient or family member offers you a gift, you should thank them for their generosity and politely decline the gift, citing Company policy.

For similar reasons, you must never request or accept personal loans from patients or their families. In some states, accepting loans from patients is against the law. In every case, it is a violation of Pinnacle policy and is subject to disciplinary action up to and including termination of employment.

Gifts to Public Officials

As a general rule, federal laws and the laws of most states prohibit giving anything of value to government officials with the intent to influence the decisions of government. In accordance with these laws, Pinnacle's policy is that nothing of value may be given to federal or state government officials.

As a company that engages federally registered lobbyists, Pinnacle is subject to the gift restrictions imposed by the Lobbying Disclosure Act of 1995. Officers, employees, and contractors acting on behalf of Pinnacle are prohibited from providing gifts or reimbursement of travel expenses to a Member or staffer of Congress unless the circumstances are otherwise noted under an exception within the rules of the House and Senate. It should be noted that these restrictions apply to gifts of even minimal value and also extend to family members of such individuals.

Antitrust Laws

Pinnacle's policy is to comply with the letter and spirit of the antitrust laws of the United States. These laws are designed to foster free and open competition in the marketplace.

Pinnacle employees should not participate in any discussion, understanding, agreement, plan, or scheme – formal or informal – with any competitor or potential competitor that restricts competition. Examples of activities that could violate the antitrust laws include making arrangements or having discussions with competitors about prices, price levels and market territories, or refusing to deal with certain customers to other competitors.

Health, Safety and Environmental Laws

Employees should be familiar with Health, Safety and Environmental policies and procedures that relate to their surroundings. This includes requirements designed to protect employees from potential workplace hazards.

Health, Safety and Environmental Laws function by:

- Regulating the handling and disposal of infectious materials
- Guiding the use of protective equipment to prevent the spread of infectious diseases
- Mandating the storage, security, handling, and disposal of hazardous materials
- Enforcing the use of safety and emergency plans

Conflicts of Interest

A conflict of interest exists if you have an interest that interferes, or appears to interfere, with your responsibilities at work or may affect your judgment when working on behalf of the company. Pinnacle's employees, officers and Board Members have a responsibility to put the interests of Pinnacle and our patients and residents ahead of any other business interests. Pinnacle's employees, officers and Board Members should not engage in any activities that conflict with Pinnacle's interests.

Some situations that may give rise to a conflict of interest include, but are not limited to:

- A Pinnacle employee accepts outside employment from or contracts with an organization that does business with Pinnacle or is a competitor of Pinnacle. While certain employees, such as nurses, are not prohibited from working shifts at another location, this additional work must be disclosed to supervisors and should not interfere with the employee's work commitment to Pinnacle or interfere with the employee's job performance at Pinnacle.
- A Pinnacle employee or an immediate family member has a material financial interest in a firm that does business with Pinnacle or is a competitor of the organization where the financial interest may affect the employee's decisions or actions.
- Using Pinnacle time, facilities, equipment, etc., for private gain or advantage, or the private gain or advantage of another.

Potential conflicts of interest must be disclosed to supervisors upon hire or as they occur. All reported conflicts must be reviewed by the Compliance Department. This includes any additional employment accepted while working for Pinnacle. Directors and executive officers must disclose any potential conflicts of interest to Pinnacle's Board of Directors. Potential conflicts of interest that are not approved or ratified by an employee's supervisor, the Compliance Department, Pinnacle's Board of Directors, or an appropriate committee of the Board of Directors, may subject the individual to appropriate action, up to and including termination of employment, taking into account appropriate and relevant facts. When in doubt, it is best to disclose.

Employees are not allowed to solicit funds for personal fundraising (i.e., school drives, girl/boy scouts, etc.) with patients or their family members. Facilities and employees will also refrain from organizational fundraising.

Employees will only witness the signing of documents that are generated by and/of reflect the facility's services (i.e., record releases, etc.). Employees are not allowed to witness patients' legal documents (wills, power of attorney, etc.) nor are they allowed to serve as notary for such documents.

Document Retention

All business documents and clinical records, in any form or medium, created or received by an employee are to be retained in accordance with applicable law and Pinnacle policy. Pinnacle has established policies and procedures for retention, preservation and disposal of such documentation. You should refer to these policies for guidance regarding document retention. Contact the Compliance Department with any questions related to Pinnacle's retention guidelines.

Contractors and Vendors

Any independent contractor, subcontractor or vendor conducting business on behalf of Pinnacle must adhere to all applicable laws and regulations. Entities are encouraged to have their own compliance program and are also expected to comply with the standards of Pinnacle's Code of Conduct. Contractors providing care on Pinnacle's behalf must show proof of licensure, certification, or other evidence of provider competency.

Contractors providing care on Pinnacle's behalf must also show evidence that he/she does not possess a criminal conviction record or an exclusion that prohibits the contractor from working within Pinnacle's criminal background screening policy. All vendors that create, receive, maintain, or transmit protected health information while performing certain functions or services on Pinnacle's behalf must sign a business associate agreement.

All contracts between Pinnacle and vendors should:

- Be in writing and for a specific term;
- Be on templates approved by Pinnacle's Chief Legal and Compliance Officer;
- Contain a Fair Market Value assessment, where appropriate;
- Include a Business Associate Agreement, when appropriate;
- Not take into consideration the volume or value of referrals provided;
- Be reviewed by the Chief Legal and Compliance Officer if it involves physician services or other clinical services; and
- Comply with all provisions of state and federal healthcare programs, laws and regulations.

Licensure and Certification

Based on your position at Pinnacle, you may be required to maintain a license or certification in order to comply with state and federal laws. Each employee is expected to maintain such license or certification in good, active standing. Employees are responsible for renewing, verifying and validating their information with the respective licensure or certification board. In the event that any disciplinary action is taken against a license or certification, the employee must report the action or potential action to their supervisor, Compliance, and Human Resources immediately.

Exclusion Programs

Pinnacle does not employ, contract with, grant privileges to, or enter into any type of arrangement with individuals, entities or vendors currently excluded by the Office of the Inspector General (OIG) or debarred by the General Services Administration (GSA) from participating in federal programs, including Medicare or Medicaid. In addition to federal exclusion programs, some states have enacted Medicaid exclusion lists. Pinnacle does not employ individuals excluded under state exclusion lists. Before employing or conducting business with any person or vendor, the individual or business must be screened against both federal and state exclusion lists.

As an employee of or vendor for Pinnacle, you are expected to immediately notify the Pinnacle Compliance department if you receive notice that you have been placed on an exclusion list.

Discrimination-Free and Harassment-Free Workplace

Pinnacle operates as an equal opportunity/ affirmative action employer and prohibits all forms of discrimination, harassment and intimidation due to a person's race, color, religion, gender, sexual orientation, military duty, age, national origin, disability or veteran's status, or any other basis protected by federal, state or local law. All Board Members, officers, employees, and contractors share in the responsibility of preventing discrimination and harassment and should report any witnessed instances of this conduct. All employees and potential employees are afforded equal employment and advancement opportunities.

To deliver on Pinnacle's commitment to quality, we work toward the highest degree of performance, behave professionally at all times, demonstrate appropriate boundaries, and promote high standards and integrity. This includes communicating respectfully and behaving properly at all times. Pinnacle also requires all employees to comply with work and safety policies in accordance with all state, local and federal regulations.

What should I do if I experience or witness discrimination or harassment in the workplace?

You are encouraged and expected to report such occurrences through one of the methods Pinnacle has provided to you. You may, as you find appropriate, report incidents to:

- Your supervisor or manager through the Open-Door Policy
- A department director or vice president
- Support Center Human Resources
- Compliance Hotline (844.755.3399)

If you feel the matter has not been taken seriously, you are encouraged to continue pursuing the matter through the next level of management. For more information regarding this topic, please refer to the Pinnacle Employee Handbook.

How can I be sure I am following the most current policies and procedures?

Pinnacle policies and procedures are found on Policy Hub which you can access by clicking on the link called "Policy Hub" on the top menu of the Pulse.

You can also visit our Policy Hub site directly by visiting <https://osipinnacle.sharepoint.com/sites/Policy>

Policies and Procedures

Pinnacle's policies and procedures, along with this Code of Conduct, provide guidance on how to perform job responsibilities ethically and legally. Each employee must be aware of the policies and procedures that apply to his or her role within the Company and are required to comply with the Code of Conduct and all Pinnacle policies.



Commitment to Education and Training

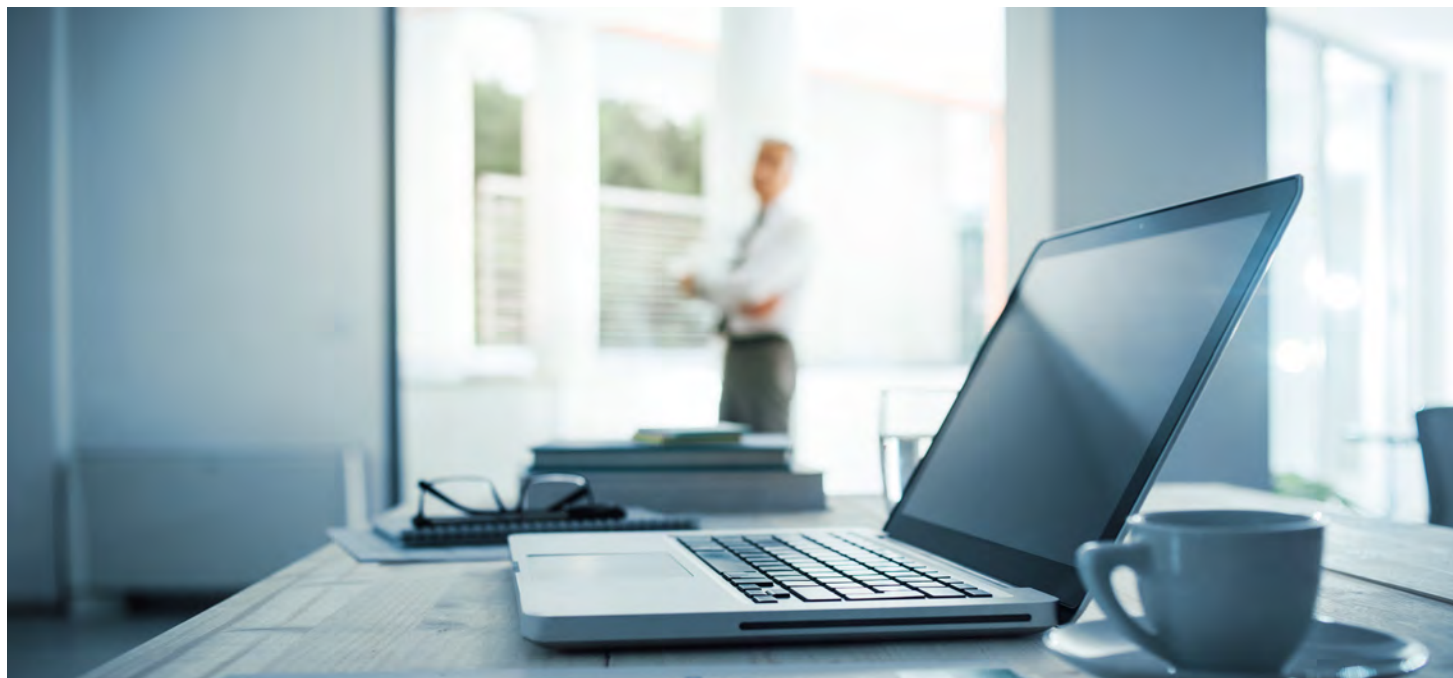
Pinnacle recognizes that education and training are critical to providing quality care and services, to providing accurate billing practices, and to conducting ethical and legal business operations. Pinnacle has established training programs to provide detailed guidance on compliance issues and to ensure that each Pinnacle representative receives the information needed to perform his or her job functions appropriately.

As an employee, you will receive education about our Code of Conduct and our Compliance Program within 30 days of hire and annually thereafter through General Compliance Training. You are also expected to participate in job-specific (role-based) training requirements that provide education of state and federal law, regulations and requirements based on your specific line of business or role.

Compliance Training focuses on:

- Fraud, waste and abuse
- Ethics and appropriate billing
- Documentation guidelines to support the requirements of participation in Medicare and Medicaid programs
- Privacy and security of health information
- Patient rights
- Anti-kickback, Stark law and gifts

Minimum training requirements are established through the Compliance Program and must be completed and documented. Pinnacle's training requirements are in Relias, its learning management system. All employees may log into Relias to view their own specific required training, training in progress, completed training, a training catalog and license certification history. For specific requirements, please see the applicable policy on the Compliance website. Education will be available for other stakeholders as requested.



Certificate of Compliance

1. I have read the entire Code of Conduct. I have had the opportunity to ask any questions with regard to its contents, and I understand fully how the policies relate to my position.
2. I hereby acknowledge my obligation and agreement to fulfill those duties and responsibilities as set forth in the Code of Conduct and to be bound by these standards.
3. I further certify that, throughout the remainder of my association with the Company, I shall continue to comply with the terms of the Code of Conduct.
4. I understand that violations of the Code of Conduct may lead to disciplinary action, including discharge.

Signature _____ Date _____

Printed Name _____

Title/Position within the Company _____

Facility Name _____

Business Telephone Number (with Area Code) _____

The first copy is to be retained by the employee/officer/Board Member/contractor. The second copy is to be retained for the employee/officer/Board Member/contractor's record.

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