

# HERITAGE FOUNDATION, INC.

## CODE OF ETHICAL CONDUCT

### **Communication of Information, Honesty and Disclosure**

Heritage Foundation requires full and fair disclosure of relevant agency information requiring candor and honesty from all employees in the performance of their duties and responsibilities. Honest disclosure of all pertinent data will extend to dealings with independent accountants, legal counsel, internal audit personnel, compliance personnel, and other regulatory agencies as required. Continued honest dealings with parties interacting with Heritage Foundation will protect and enhance its reputation for integrity and honesty.

### **Observance of the Law**

Heritage Foundation and its subsidiaries expect compliance with all facets of the law. It is expected that all individuals employed by Heritage Foundation will adhere to this standard. Where the law may be ambiguous or appear in conflict with our method of operation, employees are directed to contact Corporate Counsel to obtain an opinion.

Compliance with all pertinent governmental reporting regulations and the utilization of accepted accounting principles is a minimum standard for Heritage Foundation. All transactions of the agency must be recorded and accurately reflect the activities they represent. Intentional misrepresentations of fact or omissions of pertinent data cannot, and will not be tolerated. All personnel will be required to adhere to the financial reporting policies as they are developed. Employees must also comply with the rules and regulations contained in the Policy & Procedure Manual.

### **Fair Billing Practices**

Heritage Foundation invoices patients or third party payers in a fair and understandable manner only for services actually provided. Heritage Foundation provides assistance to patients seeking to understand the costs relative to their care. Heritage Foundation attempts to resolve questions and objections to the satisfaction of the patient while considering the agency's best interests.

### **Marketing**

Marketing practices are conducted with truth, fairness and responsibility to patients, the community and the public at large. Marketing materials reflect only services available, the level of licensure at time of publication and accreditation, and comply with applicable laws and regulations of truth in advertising and non-discrimination.

### **Receipt of Gifts or Other Items of Value**

No individual shall accept gifts, favors, entertainment, or other items of value that may compromise their decision-making abilities and result in negative influence being exerted on Heritage Foundation. The offer and/or acceptance of any questionable benefit must be reported to the Compliance Officer immediately.

The offer by any Heritage Foundation employee of money, services, or other items of value with the expectation of influencing the judgment, integrity, or decision-making ability of any patient, customer, government official or other person having business dealings with Heritage Foundation is expressly prohibited. The request for, or knowledge of, provisions of such benefit must be reported immediately.

Specifically excluded from this provision are gifts or donations that are made to Heritage Foundation in furtherance of its defined mission. As a result, all officially sponsored Heritage Foundation fundraising activities are specifically excluded from this provision. Also excluded are donations made by patients, estates of deceased patients, corporations, or other entities that desire to contribute to the furtherance of the mission of Heritage Foundation.

### **Nature of Professional Relationships**

Each licensed employee of Heritage Foundation, including, but not limited to physicians, social workers, counselors, chemical dependency counselors, and recreation, occupational therapy, music or art therapists, are expected to abide by the appropriate and applicable Code of Ethics or Code of Conduct established by their respective licensing board.

Heritage Foundation recognizes that the opportunity exists for its employees to interact with its clients in more than one context. This phenomenon, described as a dual relationship, can be present serious ethical and clinical difficulties, and accordingly all employees are to abide by the **Dual Relationship Policy and Procedure**, contained in the Policy & Procedure Manual.

### **Outside Employment**

Should Heritage Foundation employees feel it necessary to secure employment in addition to their work with the agency, they must notify their supervisor and the Human Resources Manager in writing. Outside employment must not conflict with the need for high standards of conduct connected with employment with Heritage Foundation.

Employees may not be concurrently employed by any organization, agency, institution or other entity that provides funding to or contracts with Heritage Foundation. This prohibition extends to any organization, agency, institution or other entity which fulfills a planning function or having a direct effect on Heritage Foundation or any such organization that provides a similar service in competition with Heritage Foundation, without the express prior authorization of the Executive Director.

### **Reporting Abuse and Neglect**

All employees of Heritage Foundation, without exception, are to maintain full compliance with the reporting requirements contained in the **Reporting Alleged Abuse or Neglect of Clients Policy**, contained in the Policy & Procedure Manual.