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| | **POLICY** | **Compliance Standards of Conduct Policy** |

**POLICY STATEMENT**

The Compliance Standards of Conduct is an integral part of Empowering People's Independence (EPI) Corporate Compliance Program and is a formal statement of EPI's commitment to the standards and rules of ethical conduct. All employees, Board members, Board committee members, contractors/consultants, interns, volunteers, and vendors, hereafter referred to as "Affected Individuals" are obligated to adhere to this policy.

EPI is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline employees who violate the Code, including employees who neglect to report a violation. All employees must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance staff in investigating allegations of wrongdoing. Any Affected Individual who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, or EPI policy, procedure, or practice is subject to appropriate disciplinary action, up to and including termination.

Affected Individuals are expected to deal fairly with all relevant EPI stakeholders including providers, contractors, people supported, donors, competitors, etc.

**Ethics:**

It is the policy of EPI to observe all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, Affected Individuals must obey the laws and regulations that govern their work and always act in the best interest of people supported, their families, and EPI, by meeting these expectations:

Keep management staff informed of what you are doing; document or record all services or transactions accurately; and be honest and forthcoming with EPI, regulatory agencies, and internal and external auditors.

Comply with EPI's policies and procedures, accounting rules, and internal controls. Function with honesty in your work for EPI and with all others with whom EPI does business.

**Confidentiality:**

During your employment, you may acquire confidential information about EPI, its employees, and people supported that must be handled in strict confidence and not discussed with outsiders, per policy HR1.19 Confidentiality & HIPAA Compliance. You may not release confidential information without proper authorization. Confidential information includes not only information about the people that we support and their families, but also non-public information about EPI that may be of use to EPI's competitors or harmful to EPI or people supported if released.

**Agency Property:**
EPI information may not be removed from EPI property without permission from a supervisor or administrator with proper authority over the information. Further, upon termination of employment with EPI, all EPI property must be returned.

**Information Security:**
You are responsible for properly using information stored and produced by all of EPI's computer systems.

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

**Gifts and Gratuities and Entertainment:**
You may not solicit money, gifts, gratitude, or any other personal benefits or favors of any kind from people supported and their families or from anyone currently doing business or considering doing business with EPI. You must not offer or accept gifts or entertainment of substantial value or that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision. Gifts of a nominal value (less than $15) may be accepted with approval from the Compliance Officer or designee. When a gift is received, you must provide written notification to your supervisor and Compliance Officer or designee of the nature of the gift.

**Agreements with Contractors and Vendors:**
EPI 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 services rendered. Only the President of EPI can enter into a contract on the agency's behalf.

**Conflict of Interest:**
Affected Individuals must not allow any outside financial interest or competing personal interest to influence their decisions or actions taken on behalf of EPI. Affected Individuals must avoid any situation where a conflict of interest exists or might appear between their personal interests and those of EPI. 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 Affected Individual or his or her 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 EPI; (ii) provides to, or receives from, EPI any referrals of people supported; or (iii) competes with EPI. Affected Individuals may not without permission of the Compliance Officer or President accept, solicit, or offer anything of value from anyone doing business with EPI.

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

**Use of Agency Funds and Resources:**
EPI's assets are to only be used for the benefit of EPI and people supported. Assets include funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about people

supported, financial information, computer property rights, and other business information about EPI. You may not use EPI 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.

**Use of Agency Time:**

Employees may not conduct personal errands or other outside activities during work time. Loitering or wasting time on EPI property during work and non-work hours is prohibited.

**Maintenance of Records:**

Affected Individuals must record and report all EPI business/financial information and information about people supported fully, contemporaneously, accurately, and honestly. Records include, but are not limited to, records of the people supported, documentation of services, accounting books or records, financial statements, timesheets or records, mileage, expense reports, vouchers, bills, payroll, claims payment records, correspondence, and any other method of communication.

If any records require alteration, such alteration must be made in an appropriate manner following approved EPI procedure (i.e. single line cross out, initial and date). No person shall ever sign the name of another person to any document. Signature stamps shall not be used, unless authorized. Backdating and predating documents is unacceptable.

**Falsification of Records:**

- You must not make any false entries in any of EPI's records or in any public record for any reason.
- You may not alter any permanent entries in EPI's records.
- You may only approve payments or receipts on behalf of EPI 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 EPI's books, are strictly prohibited.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.

**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, or 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 EPI must always comply with legal and regulatory requirements and EPI policy. You may not destroy any records, especially those pertaining to litigation or government investigations or audit without express written approval of the Compliance Officer or President.

**Governmental Investigations:**

There may be times that EPI 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 EPI or an individual within EPI. Affected Individuals must report any requests for information or cooperation with an investigation to the Compliance Officer or President immediately.

**Seeking Guidance About Violations:**

Affected Individuals must report any actual or suspected violations of this Compliance Standards of Conduct,

any applicable law or regulation, or any EPI policy and procedure to their immediate supervisor or to the Compliance Officer or designee. A Compliance Hotline is also available for confidential or anonymous reporting of such issues (585-442-6420 x2400).

When an actual or suspected violation of this Compliance Standards of Conduct, any applicable law or regulation, or any EPI policy and procedure is reported to any EPI employee, it must be promptly referred to the Compliance Officer or designee. Steps will be taken to protect confidentiality and anonymity, when appropriate and warranted. EPI will not tolerate any form of retaliation against a person who makes a good-faith report in accordance with this policy or the Corporate Compliance Program/Policy.

All employees and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Conduct, any applicable law or regulation, or EPI policy, procedure, or practice.