

CODE OF CONDUCT

P.R.I.D.E.
Personal Responsibility In Delivering Excellence



John Knox Village

Compliance HELPLINE

Report concerns about the Code of Conduct or compliance with laws or regulations.

- Calls are accepted 24 hours a day.
- All calls are confidential.
- Concerns also can be sent to the corporate compliance officer in the Administrative Center.

**When calling from outside the Village campus:
816-246-4343 Ext. 7233 (SAFE)**

**When calling from the Village campus:
Ext. 7233 (SAFE)**

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Mission

To enrich the lives of older adults through community living
“Enriching lives and building community”

Vision

To be the leader among senior living communities in the greater Kansas City Area

To carry out our mission and vision, John Knox Village must maintain the highest reputation for ethics and integrity. The John Knox Village Code of Conduct is your guide to ensure you are making the right decisions for the right reasons. It is the responsibility of everyone associated with John Knox Village, including associates, board members, officers, volunteers, contractors and others to act in accordance with the Code of Conduct and supporting policies.

Message from the CEO

You are expected to review and adhere to the principles and standards of the John Knox Village Code of Conduct. It will remind you of the foundational principles of our P.R.I.D.E philosophy – Personal Responsibility in Delivering Excellence. We expect everyone to dedicate themselves to enhancing the physical, mental and spiritual health of the diverse communities we serve. Just as you make decisions that are honest and ethical in your personal life, we expect you to apply compassion and integrity with our residents, patients, their family members, clients and your fellow associates.

If, after reviewing the Code of Conduct, you have any questions, please discuss your concerns with your manager, your vice president or your human resources representative. You also can call the 24-hour confidential HELPLINE at 816-246-4343 Ext. 7233 (from outside the Village) or by simply dialing extension 7233 on the Village campus. This number also can be found on the back of your ID badge. Finally, you can reach the compliance officer at that number or by calling 816-347-2109.

The most important job each of us has is to ensure that our residents and their families maintain a high level of trust in the service and care we provide. By consistently following our Code of Conduct and striving to provide the highest quality of care, we will continue to earn and deserve that trust.

Sincerely,

Anthony Columbatto
President and Chief Executive Officer
John Knox Village



John Knox
Village

Compliance is P.R.I.D.E. in ACTION – Do the right things, the right way, the first time, every time.

CODE OF CONDUCT AND YOU

John Knox Village (JKV) is committed to the goal of serving our residents/patients, associates and the community in compliance with applicable laws, regulations and the ethical standards of the life plan community industry. This commitment means that you are expected to do what is required and what is right.

The Code of Conduct is the backbone of our corporate compliance program. It provides general guidance and does not replace policies and procedures of the Village nor any of its individual departments or business units (i.e. Village Care Center, Village Home Health, Village Hospice, etc.). If there is no specific policy, the principles set forth in the Code of Conduct become the policy. The Code of Conduct is a “living document” that is updated periodically to respond to changing conditions. JKV reserves the right to modify or terminate any or all of these standards at any time.

You are not expected to have expert knowledge of all legal and regulatory requirements that may apply to your job. You are expected to:

- Be familiar with the Code of Conduct;
- Commit to conduct and decisions that are legal and ethical;
- Ask questions if you are not certain about a particular situation; and
- Report concerns you may have about potential violations of the Code of Conduct or any misconduct or wrongdoing.

There will be no retaliation against anyone for making a good-faith report of inappropriate conduct, including if the report turns out to be wrong. Not reporting known, observed or suspected violations of the Code of Conduct can result in corrective action up to and including separation of employment with JKV. You are expected to cooperate with any investigation and resolution of a compliance issue.

Retaliatory conduct against anyone who cooperates with an investigation in compliance with the Code of Conduct is absolutely prohibited.

Q: What should you do if you have questions or concerns about the conduct of someone at work? Will you get in trouble for reporting?

A: You have a duty to report a concern. Speak with your manager, your HR representative or contact the compliance officer. You can also use the number on the back of your badge to leave a confidential message on the Compliance HELPLINE. There is no retaliation for good-faith reporting.



CONDUCT PRINCIPLES/STANDARDS AND RISKS

The following Conduct Principles and Standards provide a summary of the Village's expectations regarding specific ethics and compliance risk areas. These are general guidelines that are set out to provide a general overview. There may be specific policies for individual departments or business units that exist for a particular topic.

PRINCIPLE 1: **Resident/Patient Relationships**

Standard of Conduct: We strive to provide outstanding quality care and services. Our first responsibility is to our residents/patients, associates and the communities we serve.

Quality/Resident and Patient Satisfaction

John Knox Village has a legacy of excellence and commitment to quality of care and exceeding the expectations of our residents/patients and their families. We provide care and services in a courteous and caring manner, mindful of and sensitive to race, color, national origin, sex, gender, pregnancy status, age, religion, handicap or disability, veteran status, sexual orientation or other status protected by law. JKV is committed to consistently following well-designed programs, services and plans of care based on the needs of residents and patients. We strive to provide affordable care that finds its basis in established standards of care and best practices. JKV will continue to strive for excellence in all that we do.

The quality of care we provide is directly dependent upon the qualities of the people who are hired to deliver it.

Resident/Patient Rights

Residents and patients have a fundamental right to receive services and care that safeguard their personal dignity and respect their unique and diverse values. Every associate is expected to recognize and respect resident- and patient-centered values that inform how to meet resident/patient needs and preferences. JKV is committed to preserving everyone's dignity at all times.

Residents/patients have a right to designate a personal representative. Families and personal representatives can raise concerns about ethical and legal/regulatory issues without fear of retaliation or diminished quality of care. Associates are empowered to resolve complaints.

Advance Directives

Patients and residents will be informed of their right to make advance directives. JKV strives to comply with policies, laws and regulations regarding advance directives and will follow a resident's/patient's wishes set forth in a valid advanced directive.

Discrimination and Harassment of Resident/Patients

JKV complies with applicable federal civil rights laws and does not discriminate on the basis of race, color, national origin, sex, gender, pregnancy status, age, religion, handicap or disability, veteran status, sexual orientation or other status protected by law. JKV does not exclude people or treat them differently because of any protected status. JKV also provides free aids and services to those whose primary language is not English so that they may communicate effectively.

Abuse, Neglect or Mistreatment

Any type of abuse, neglect or mistreatment of residents/patients is not tolerated. All associates shall refrain from committing, and must protect residents from, abuse, neglect or mistreatment. This includes verbal abuse, sexual abuse, physical abuse, mental abuse, involuntary seclusion, neglect and misappropriation of resident/patient property. Associates are mandatory reporters of such conduct.

PRINCIPLE 2: Legal Compliance

Standard of Conduct: We are committed to high standards of business and professional ethics and integrity. We will provide resident/patient services and care as well as conduct our business operations while following applicable federal, state and local laws, regulations and JKV policies.

Anti-kickback Statute

Federal and state laws prohibit offering, soliciting or accepting a kickback to the organization or person to induce the purchase of services from or refer residents/patients to John Knox Village. JKV associates will not engage in any such behavior or activity. Examples of the types of activity that may violate the Anti-kickback Statute and similar Missouri law include the following:

- Offering or paying anything of value to induce someone to refer a patient to a JKV health care service/facility, including routine waivers of co-pays or deductibles;
- Offering or paying anything of value to anyone while marketing health care services;
- Soliciting or receiving anything of value for the referral of JKV residents/patients;
- Giving or receiving free goods or discounts, except as permitted by law or policy; and
- Receiving any payment or item of value outside of the normal compensation arrangement for performance of an associate's responsibility performed on behalf of JKV.

False Claims

JKV is committed to correct and accurate coding, billing and reimbursement procedures that comply with federal and state regulations. (Refer to the False Claims Act policy on www.myjkv.org.) Billing or submitting a claim for items or services that were not provided as documented, not medically necessary or in any way false, misleading, inaccurate or fictitious is prohibited by law. If any associate becomes aware of claims and/or billing errors, contact your manager, the compliance officer or the Compliance HELPLINE using the number on the back of your name badge.

Inducement

Federal and state laws prohibit offering or transferring anything of value to a Medicare or Medicaid beneficiary that the person making the offer knows or should know may or is likely to influence the beneficiary to receive items or services from JKV. Associates will never offer any item or service to a Medicare or Medicaid beneficiary that would influence them in their choice of a health care provider.

Safe Medical Devices Act

JKV complies with the FDA's medical device reporting requirements. Timely reports are made to the FDA and/or the manufacturer where a device-related serious injury or death occurs. Such events are reported to the risk management department. Reporting procedures are followed in accordance with regulations and policy.



Survey and Licensing

JKV addresses all authorized federal and state surveyors and accrediting bodies openly, honestly and professionally. Our behavior will never mislead a surveyor or survey team either directly or indirectly.

Marketing and Advertising

JKV represents its services, facilities and activities in an accurate and honest manner. Inaccurate or exaggerated statements are not made in promotional materials of any kind.

Q: Why can't we give the therapists gifts or bonuses when we think they are doing a great job with our rehab patients?

A: We have a legal duty to comply with laws that govern relationships between JKV and health care providers, such as therapists and medical directors. We must follow the terms of the contract.

CONDUCT PRINCIPLES/STANDARDS AND RISKS



PRINCIPLE 3: Business Ethics

Standard of Conduct: We are committed to high standards of business and professional ethics and integrity. We will provide resident/patient services and care as well as conduct our business operations while following applicable federal, state and local laws, regulations and JKV policies.

Conflict of Interest

JKV (as a system entity of PremierLife) is committed to acting in good faith in all aspects of our work. We will avoid conflicts of interest or the appearance of conflicts of interest of any associate or board member and their work and avoid conduct that is disloyal, competitive or damaging to JKV. Associates, board members, officers, vendors, contractors and others are expected to carry out their job responsibilities independent of personal gain and in the best interest of JKV. In all dealings with and on behalf of JKV, all associates, board members, officers, vendors, contractors and others are held to strict rules of honest and fair dealing at all times. The following is prohibited:

- No person shall use their position or knowledge gained therefrom in such a way that a conflict might arise between the interests of JKV and the individual;
- Any act of such persons in their capacity as an associate, board member, officer, vendor, contractor and other that is not in the best interest of JKV;
- Use of JKV resources for non-JKV use unless authorized by senior management in accordance with policy; and

- Engaging in activity that may adversely affect JKV's tax-exempt status, including certain lobbying and political activity.

Disclose fully and frankly any and all potential conflicts as to JKV that may exist or appear to exist, whether personal or business-related. The following is a partial list of activities and circumstances that must be disclosed:

- Ownership or financial interest in or employment by any outside concern that does business with JKV or competes with JKV;
- Intellectual property rights such as a patent, copyright or royalties;
- Serving as a director, manager or consultant, or performing as an employee of any outside concern that does business with or competes with JKV;
- Providing any service to a concern or entity that is in competition with any JKV service;
- Conducting business dealings with any outside concern or entity that does business with or competes with the services of any JKV service offering, renders other services in competition with any JKV service, or is or has the potential to be in an adversarial position with JKV;
- Represents JKV in any transaction in which the associate or a family member has a personal interest;
- Any outside employment (moonlighting) for any concern or entity that does business with or competes with any JKV service, or provides other services in competition with any JKV services; and
- Accepting any gifts, entertainment or other business courtesy from any person or entity with whom JKV has or may have a business relationship where it could be inferred that such a gift, gratuity or business entertainment is intended or appears to be intended to influence the associate's judgment.

Any conflict of interest involving an associate, board member, officer, vendor, contractor and other must be disclosed to the associated manager or to the compliance officer. Board members should notify the office of the President. (*Also see the Conflict of Interest Policy in the Associate Policy Manual and the John Knox Village Corporate Board of Directors Policy 00-02-6000-003*).

If an associate has a question about conflicts of interest, it is his/her responsibility to notify his/her manager and/or the compliance officer. (Also see the Associate Policy Manual, Policy 01-05-6500-411.)

Q: I work as a social worker for the Village Care Center. I took a weekend job at another long-term care facility in Kansas City. Do I need to tell anyone?

A: Yes, notify your manager. You must complete the Conflict of Interest disclosure form. This allows a review and evaluation of any potential concerns depending on your role at JKV.



Government Investigations

JKV strives to fully comply with the law. The Village seeks to cooperate with authorized officials serving a valid search warrant, subpoena or other legal form of inquiry. JKV must balance its legal rights and ensure its personnel are protected. If you are ever served with a search warrant or subpoena, or receive another inquiry regarding JKV operations from any government agency, or from any person claiming to represent a government agency, you

must immediately notify the department director, administrator and the corporate compliance officer. If you are contacted at home by a government agency concerning JKV business, you may ask the agency representative to contact you later and immediately contact the corporate compliance officer to review the matter.

Upon notice of a warrant, subpoena or investigation an associate must:

- Notify his/her manager and corporate compliance officer immediately;
- Never destroy or alter any document or record subject to a search warrant, subpoena or investigation;
- Never lie or make a false or misleading statement to any authorized official or investigator; and
- Never try to persuade any other person to provide false, fictitious or misleading information to any authorized official, investigator or auditor.

Retaliatory conduct against anyone who reports compliance concerns in good faith or who cooperates with an audit or investigation is prohibited.

Media

If contacted by any member of the media with an inquiry, contact JKV media relations personnel in the Marketing and Communications (MARCOM) department. You can reach them via dispatch/security as well. Only MARCOM staff is authorized to speak officially on behalf of JKV. Seek assistance in case of any media contact. MARCOM will contact the media about a story or news item about JKV.

Q: You or a member of your staff is contacted by a reporter who works for a newspaper, magazine, trade journal or television program and is doing a story involving JKV. What should you do?

A: Refer all media inquiries to MARCOM. They can be reached through dispatch/security.

CONDUCT PRINCIPLES/STANDARDS AND RISKS

Tax and Not-For-Profit Issues

JKV has a legal obligation to devote its activities to promote its principle purpose to further the public good rather than the private or personal interests of any one person. JKV must avoid business arrangements that exceed fair market value, not participate in any political campaign for or against any candidate for public office, accurately report all financial operations and comply with all applicable tax law and regulations. Associates are expected to contact the director of finance to address concerns regarding the JKV tax-exempt status or other tax-related concerns.

PRINCIPLE 4: Privacy and Security Compliance

Standard of Conduct: We are committed to protecting JKV property and information against loss, theft, destruction and misuse.

Confidentiality of Resident/Patient Information

As part of your job, you may have access to very confidential protected health information of the residents and patients we serve.

Residents and patients have important rights regarding their protected health information under HIPAA regulations. JKV complies with those privacy regulations. The following rights must be complied with at the request of a resident or patient:

- Right to receive a copy of our Notice of Privacy Practices,
- Right to inspect and copy,
- Right to an Accounting of Disclosure, and
- Right to amend.

Associates must never disclose resident- or patient-specific information unless authorized by the resident/patient or if the information is part of treatment, payment or health care operations. Any questions regarding what information can be disclosed are to be taken to the privacy officer (816-347-2109) or the system security officer in the I.T. department (816-347-2903.)

More information is available on www.myjkv.org.

Compliant Use of Computer and Other Electronic Systems

Based on your job, you will be authorized to access one or more JKV computer systems or communications networks. Passwords or other credentials assigned to access a computer system must never be disclosed to another. Never attempt to access a computer system or device with any other password than your own. If a password is lost or stolen, notify the I.T. systems security officer immediately.

Associates are authorized to use the computer system only to fulfill their job responsibility. Casual browsing of resident or patient records is strictly prohibited. Records should only be accessed/viewed when necessary to perform job duties.

All electronic messaging systems are for JKV business purposes only. All users must follow HIPAA and security policies that can be reviewed on www.myjkv.org.

Protection and Use of Information, Property and Assets

John Knox Village property, assets and information will be protected against loss, theft, destruction and misuse. Non-public business, strategic, financial, personnel or technological information must not be disclosed without management authorization. Many laws protect copyrighted materials, computer software and other media from prohibited uses. Unauthorized duplication or downloading of computer software or files is prohibited.

JKV materials, supplies, equipment and other resources are never to be used for personal use except where authorized by management.

Q: What does politics have to do with being a tax-exempt organization?

A: *The IRS prohibits tax-exempt entities such as JKV from engaging in activities that attempt to influence legislation or any political campaign.*

Q: Can I share my password with my co-worker? This would make us more efficient.

A: No. Never share your password, username or other access code with another person. Never use someone else's username or password to gain access to the computer system or any other electronic device.

PRINCIPLE 5: Associate Conduct with Residents/Patients and Suppliers

Standard of Conduct: JKV demonstrates its high standards of health care and other services to residents and patients with every interaction. JKV treats residents and patients and their families with dignity and respect at all times.

Gifts (See also: Conflict of Interest)

JKV strives to protect its reputation and to avoid an appearance of improper dealings or conduct. Except in limited ways (see the Tipping and Gifts policy in the Associate Policy Manual, Policy 01-05-6500-432), associates are prohibited from soliciting or accepting tips or personal gratuities from residents, patients or their families.

Occasionally, non-cash gifts are offered in appreciation to an associate. This kind of recognition may be accepted if it is of nominal value.

Associates must never directly or indirectly borrow from or lend money to or engage in any personal financial transaction with a resident/patient or family member for any reason whatsoever.

Associates may not act as an agent for or accept power of attorney on behalf of a resident or patient, or be named as an executor of a resident or patient estate (unless the resident or patient is a relative of the associate).

If a resident/patient or family member wishes to make a monetary gift to an associate or department, he/she should be referred to the John Knox Village Foundation.

Associates will comply with the Inducement section (see page 7) of the Code of Conduct at all times including interaction and relationships with residents/patients and their families.



CONDUCT PRINCIPLES/STANDARDS AND RISKS

Workshops, Seminars and Training

JKV pays for authorized expenses related to seminars, workshops and training sessions. Arrangements offered by a vendor to pay for an associate's training costs and travel must be submitted and approved by management before making a commitment to attend or participate in such activities. Such arrangements must be documented and retained.

Q: What if a new vendor seeking JKV business wants to treat your entire staff to a catered barbecue lunch at work in appreciation for considering their services?

A: You must decline. Accepting gifts from vendors is not to be permitted. This conduct can be used as grounds for fines and penalties for violation of anti-kickback and inducement statutes.

Q: You know a resident who is in financial distress. The family asks you to set up an online funding page to assist with mounting bills. What should you do?

A: You must decline. Associates must never engage in any kind of financial transaction with a resident/patient or his/her family for any reason whatsoever. Placing any digital content on social media by an associate can result in a serious HIPAA breach as well.



Modest non-cash gifts may be accepted. Notify your manager or contact HR or the compliance officer with any questions about acceptable conduct with residents.



PRINCIPLE 6: Human Resources Matters – Workplace Conduct and Employment Issues

Standard of Conduct: JKV is committed to creating a workplace where all associates are treated with respect and fairness while being empowered to get the job done at or above expectations. JKV strives to attract and retain associates who share a personal commitment to our mission, vision and values.

Americans with Disabilities Act

JKV will comply with applicable law to ensure qualified applicants and associates with a known disability who are able to perform the essential functions of the job with or without reasonable accommodation and whose employment does not pose a threat to their health and safety or that of others, are provided with equal employment opportunities.

Discrimination and Harassment

JKV will strive to provide a work environment for all associates free from harassment and intimidation or hostile interaction. JKV will not tolerate harassing conduct by an associate, volunteer, resident/patient or their family members and all third parties (whether communicated verbally, visually, physically, electronically or otherwise) such as degrading, humiliating jokes; ethnic, racial, religious or sexist slurs; sexually inappropriate communications; or communications based on any protected status (i.e. race, color, sex, national origin, age, disability, religion, genetic information, ancestry, or any other status prohibited by law).

If you feel that you or another person may be the subject of discrimination or harassment you should report your concerns to one of the following: your manager, VP of Human Resources, the Manager of Human Resources, the compliance officer or the Compliance HELPLINE. (You can call the number on the back of your badge to leave a confidential message.)

Bullying behavior is not acceptable and JKV is committed to the elimination of all forms of bullying. If you encounter any form of hostile or offensive behavior based on race, color, national origin, sex, gender, pregnancy status, age, religion, handicap or disability, veteran status, sexual orientation, gender identity or expression, or other status protected by law, including any form of unwelcome sexual behavior, you should communicate your concerns or objections to the offender and report the matter to one of the following: your manager, Human Resources, the compliance officer or the Compliance HELPLINE. (You can call the

number on the back of your badge to leave a confidential message.)

Health and Safety

We are committed to maintaining a community that protects the health and safety of our residents, patients and associates. JKV strives to provide an environment that is reasonably free of recognized hazards as well as to minimize the risk of injury and occupational illness. JKV is committed to complying with the numerous federal, state and local safety and environmental laws that apply to its operation.

Associates are responsible to comply with all safety policies and procedures. Some examples are:

- Applicable laws, regulations and accreditation standards (OSHA, insurance companies, EPA, DOT, National Fire Codes, etc.);
- Lessons learned from monitoring and investigating incidents, accidents and occupational illness;
- Consulting services regarding health and safety practices; and
- Input from safety, quality assurance and performance improvement teams and committees.

Reporting hazardous work practices or conditions is required. Make such reports timely to your manager, the risk manager, appropriate internal safety contacts or leave a message on the Compliance HELPLINE. (You can call the number on the back of your badge to leave a confidential message.) You are required to complete assigned safety training appropriate for your job or work area. Timely completion of safety and other compliance training is evaluated during your annual performance review.

The Village maintains a document retention and destruction policy. (See HIPAA Policies on www.myjkv.org.) All documents related to safety, fire and life safety compliance, environmental conditions or any permits, inspections and authorizations must be maintained in accordance with JKV document retention policies.

Substance Abuse/Drug-free Workplace

JKV will follow all laws and policies regarding the manufacture, sale, possession, distribution or use of controlled substances including alcohol.

The unlawful presence of any detectable amount of any drug, including controlled substances on the JKV campus or any satellite facility/property is strictly prohibited.

CONDUCT PRINCIPLES/STANDARDS AND RISKS

Lawful but impairing drug use:

Any associate in a patient-care or other safety-sensitive position who is using any controlled substance or over-the-counter drug legally must advise the Human Resources Associate Health & Benefits Representative or his/her manager while taking such controlled substance or over-the-counter drug if that controlled substance or over-the-counter drug might impair safety, judgment, performance or any motor functions or as soon as the associate realizes that the use may be impairing safety, judgment, performance or any motor functions. Failure to timely report such lawful use of a controlled substance or over-the-counter drug may result in corrective action up to and including separation.

Please refer to the Associate Policy Manual, Policy 01-05-6500-413 for information related the JKV Drug-Free Workplace.

Excluded or Sanctioned Providers, Associates, Board Members, Officers, Volunteers, Contractors and Others

Federal law prohibits health care providers from employing or doing business with a person or entity that is excluded from providing services in a federal health care program (i.e. Medicare or Medicaid). Prior to starting service to JKV, whether as an associate, board member, officer, volunteer, contractor or other, it will be confirmed and verified that individuals or entities are not excluded or sanctioned from participating in a federal program. Associates are required to report to their manager or to human resources in the event you are excluded or sanctioned. All associates must affirm their exclusion status every year via the annual compliance reporting form.

Confidential Personnel Matters

Although associates are allowed to discuss with one another their pay, benefits and working conditions, confidentiality of information is otherwise protected and maintained. This includes resident, patient, and associate information, copyrights/trademarks and/or licenses, as well as information unique to the business of John Knox Village (proprietary).

Licenses, Registrations and Certifications

To help ensure quality of care and comply with federal, state and local laws, JKV requires associates to provide their current license, registration or certification

if it is a requirement related to your job and duties. JKV validates such licenses, registrations and certifications as part of initial employment and periodically thereafter. Independent contractors such as staffing agency individuals are responsible for keeping required credentials current. JKV strives to ensure associates, businesses and independent contractors have and maintain any licenses or credentials required by law.

Social Media

The use of social media can foster learning and valuable communication when used with responsible care and good judgment. JKV requires the privacy and confidentiality of residents, patients, families and associates be maintained at all times and under all circumstances.

Any social networking conduct in or outside of work that negatively compromises the job performance of JKV associates or may adversely affect JKV residents/patients, or the business interests of JKV may result in corrective action up to and including separation. In accordance with other sections of the Code of Conduct, HIPAA, social media and networking policies, associates must never discuss residents or patients or any aspect of their care; send or post any pictures of residents/patients; or discuss any confidential, proprietary or business matters using any social media platform. Associates will be held personally responsible for the content they publish on any social media platform and must respect resident and patient privacy and all health care system security laws and regulations.

Political Activity

Associates must not conduct themselves in any way that could jeopardize the tax-exempt status of JKV. Likewise, associates must comply with all applicable laws regarding campaign finance and ethics laws.

JKV cannot engage in direct or indirect political campaign activities (including publishing and distributing of statements) in support of or in opposition to candidates for public office. Associates are prohibited from using JKV funds in any manner as a contribution to any candidate for political office, political party, candidate's committee or to any individual in violation of these laws. You may personally participate and contribute to any political organization or campaign, but as an individual and not as an agent of JKV.

JKV advocates and makes public communications and pronouncements concerning legislation or regulations being considered that pertain to health care, social, business or economic issues that affect JKV. All JKV interactions with governmental bodies and public officials are conducted honestly and ethically. We intend to comply with campaign activity laws – federal, state and local.

Reporting Process and Non-Retaliation

Four-step Process

If you observe or become aware of any activity that you believe may be unethical, illegal or wrong, use the following four-step process to get answers to your questions and report concerns. All associates, credentialed physicians, volunteers and agents of JKV have an affirmative duty to report any violations. Throughout this process your identity will be kept confidential as much as possible.

1. Talk to your manager. He/she is most familiar with the laws, regulations and policies that are unique to your work and most problems can be resolved at this level.
2. If you are not comfortable contacting or discussing your concerns with your manager, if you do not receive an adequate response from him/her, if it is otherwise not possible, or if both you and your manager have additional questions or concerns, talk to your department director or vice president.
3. If you still have questions, or if you prefer, contact human resources or the compliance officer (816-347-2109).
4. If, for any reason, you feel you cannot follow the above steps, call the Compliance HELPLINE. (See the numbers below. Also refer to the back of your name badge for the HELPLINE number.)

- When calling from the Village campus: Ext. 7233
- When calling from outside the Village campus: 816-246-4343 Ext. 7233

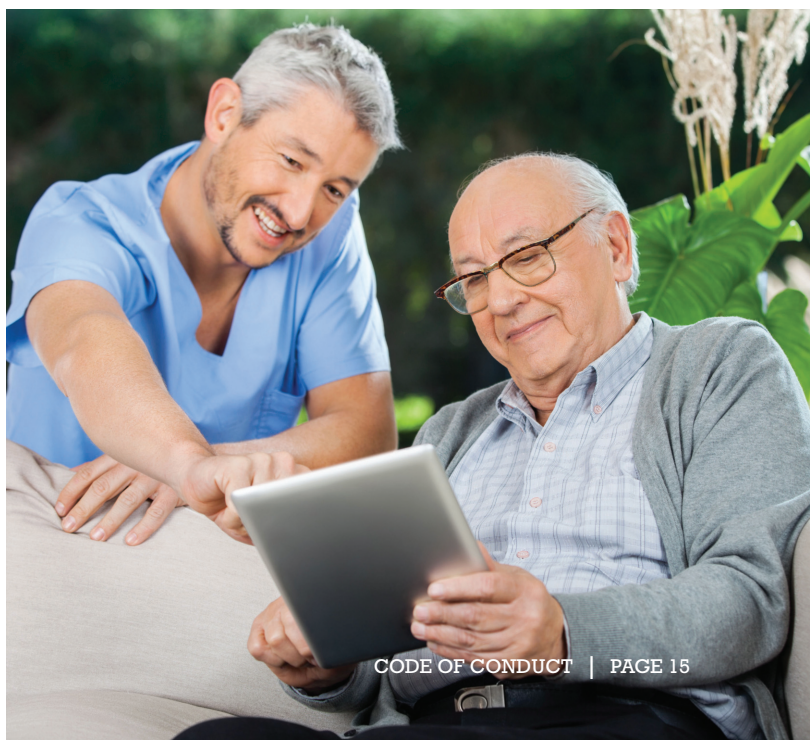
The compliance officer will review and address all reports to the HELPLINE.

Throughout this process, each concern will be taken seriously and each person involved will be treated with dignity and respect. JKV will conduct a review or investigation and follow up with an appropriate response to the reporting party as quickly as possible. Associates are encouraged to resolve concerns and problems of any kind through the JKV problem solving process found in the Associate Policy Manual, Policy 01-05-6500-512.

Non-retaliation Policy

JKV is committed to protecting associates and others who report compliance concerns and problems in good faith from retaliation and retribution. No disciplinary action or retaliation will be taken against you when you report a perceived issue, problem, concern or violation to management, human resources, corporate compliance or the compliance HELPLINE in good faith or act as a whistleblower pursuant to the False Claims Act or other applicable law. The “good faith” requirement means an associate actually believes or perceives to be true the information reported. Of course, an associate who reports his or her own non-compliance is not insulated from the consequences of such non-compliance.

Treat everyone with respect and empathy all the time.



CODE OF CONDUCT



Do the right thing, the right way, the first time.
Compliance is PRIDE in ACTION

Contact Us

John Knox Village Compliance
400 N.W. Murray Road
Lee's Summit, MO 64081
www.jkv.org

Compliance HELPLINE

When calling from outside the Village campus: 816-246-4343 Ext. 7233 (SAFE)

When calling from the Village campus: Ext. 7233 (SAFE)

