



CODE OF CONDUCT HANDBOOK

PURPOSE

This Code of Conduct has been adopted by Springpoint and its affiliates' (Springpoint) Boards of Trustees to provide standards by which employees of Springpoint will conduct themselves in order to protect and promote organization-wide integrity and to enhance Springpoint's ability to achieve the organization's mission, vision and values.

Our Mission

To inspire our family with endless opportunities.

Our Vision

To be the premiere provider, offering exceptional services and innovative programs that empower those we serve and those who serve them to experience the best that life has to offer.

Our Values

Respect: We recognize the value and dignity of every person.

Commitment: We are accountable to the greater community.

Compassion: We seek to understand and empathize with others.

Service: We strive to exceed expectations.

Excellence: We strive for the highest quality in all that we do.

Integrity: We are honest, responsible and ethical.

Innovation: We aim to continuously improve our services and organization.

INTRODUCTION

The Code of Conduct contains *Principles* articulating the policy of the organization and *Standards*, which are intended to provide additional guidance to persons functioning in managerial or administrative capacities. The Principles and Standards set forth in this Code of Conduct are in addition to, and not instead of, specific policies and procedures of Springpoint and it is the duty to each employee to perform his/her duty in accordance with such policies and procedures. The Principles set forth in this Code of Conduct shall be distributed periodically to all employees. The Principles and Standards shall be distributed annually to trustees, officers, selected employees, volunteers and medical staff members having administrative or managerial responsibilities. All employees are responsible to ensure that their behavior and activity is consistent with the Code of Conduct.

As used in this Code of Conduct, the term "Springpoint" means Springpoint and/or each of its affiliates. The terms "officer," "trustee," "employee," and "volunteer" include any person who fills such a role or provides services on behalf of Springpoint or any of its affiliates.

Maintaining the high ethical standards of Springpoint is everyone's responsibility. If we become aware of or suspect a situation that might jeopardize the ethical integrity of our organization, it is your obligation to report the circumstances. These duties apply to all of us, including employees, vendors, volunteers and board members.

Springpoint's Compliance Line is a simple, confidential, risk-free method for us to report compliance concerns. Your concerns can be reported by calling 800-876-2023. You may call anonymously, 24 hours a day, 7 days a week. Calls are not recorded, and confidentiality is protected up to the limits of the law and to the greatest extent possible. Some concerns may be referred to Human Resources.

MISSION AND VALUES STATEMENT

1. Springpoint is a nonprofit organization providing a continuum of care, which includes diverse programs and services to assist adults of all faiths to live as independently as possible in the living environment of their choice. Springpoint is committed to providing high quality care and services in a cost-effective manner. In pursuit of our mission, we are committed to the delivery of the highest quality care and services to adults in a manner that recognizes and respects the individuality and worth of each resident;
2. treating each of our residents with respect, compassion and kindness;
3. conducting our business at all times in an honest and ethical manner, in compliance with all applicable laws;
4. providing for a safe and non-discriminatory workplace;
5. keeping truthful, accurate and complete records;
6. maintaining the confidentiality of client and employee information; and
7. recognizing the value of our colleagues and, as we execute our mission, treating each other with dignity and respect in all interactions.

Diversity, Equity and Inclusion Commitment Statement

In support of our mission to inspire the Springpoint family with endless opportunities, we are fully committed to embracing diversity, equity, and inclusion. To value and empower the lives we touch, Springpoint fosters a culture that respects the unique qualities, life experiences, and wisdom of each individual. It is through this diverse and inclusive environment that we are more engaged, creative, collaborative, and innovative so all members of our Springpoint family can experience the best that life has to offer.

PRINCIPLE 1 – RESIDENTS

Springpoint will strive to provide the highest quality of care that responds to the needs of each of our resident's physical, mental and psychosocial well being.

Standard 1.1. Self-Determination/Freedom of Choice

All employees must provide service to the residents in a manner consistent with resident rights, which promote freedom of choice, self-determination, and reasonable accommodation of individual needs. The Resident Rights are listed in The Source, the Springpoint information guide for employees. All employees must be familiar with these rights as they relate to the services that our employees provide to our residents.

Standard 1.2 Quality of Care

Employees shall take proactive measures to identify, anticipate and respond to quality of care risk areas to improve the quality of each resident's life. Deficiencies identified by internal audits or by governmental surveyors will be addressed and, where appropriate, corrective action will be incorporated into the facility's policies and procedures as well as reflected in training and educational programs.

Standard 1.3 Respect & Dignity

Springpoint has made a commitment that it will provide adult services in an environment free from abuse. Springpoint believes strongly that each resident entrusted to our care will be afforded an environment of respect and dignity. To that end, Springpoint will:

- a. investigate all allegations of suspected resident abuse and report such events to the Office of the Ombudsmen, State Department of Health and Senior Services, and/or any other applicable agency required by law;
- b. require every employee to report any incident of suspected abuse by staff, residents and/or visitors;
- c. take appropriate action based on the investigation findings; and
- d. decrease the incidence of abuse through pre-employment screening and employee training.

PRINCIPLE 2 - LEGAL COMPLIANCE

Springpoint will strive to ensure all activity by or on behalf of the organization is compliant with applicable laws.

The following Standards are intended to provide guidance to employees and management in administrative positions to assist them in their obligation to comply with applicable laws. These standards are neither exclusive nor complete. Employees are required to comply with all applicable laws, whether or not specifically addressed in these policies. If questions regarding the existence of, interpretation or application of any law arise, they should be directed to Springpoint's General Counsel.

Standard 2.1 - Antitrust

All employees must comply with applicable antitrust and similar laws that regulate competition. Examples of conduct prohibited by the laws include (1) agreements to fix prices, bid rigging, collusion (including price sharing) with competitors; (2) boycotts, certain exclusive dealing and price discrimination agreements; and (3) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices. Employees are expected to seek advice from the Springpoint's General Counsel when confronted with business decisions involving a risk of violation of the antitrust laws.

Standard 2.2 - Tax

As a nonprofit entity, Springpoint has a legal and ethical obligation to act in compliance with applicable laws, to engage in activities in furtherance of its charitable purpose, and to ensure that its resources are used in a manner which furthers the public good rather than the private or personal interests of any individual. Consequently, Springpoint and its employees will avoid compensation arrangements in excess of fair market value, will accurately report payments to appropriate taxing authorities, and will file all tax and information returns in a manner consistent with applicable laws.

Standard 2.3 - Fraud and Abuse

Springpoint expects its employees to refrain from conduct that may violate the fraud and abuse laws. These laws prohibit (1) direct, indirect or disguised payments in exchange for the referral of patients; (2) the submission of false, fraudulent or misleading claims to any government entity or third party payor, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or claims which do not otherwise comply with applicable program or contractual requirements; and (3) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service. (For additional guidance, please refer to the Springpoint Fraud and Abuse Compliance Policy.)

Standard 2.4 - Lobbying/Political Activity

Springpoint expects each of its employees to refrain from engaging in activity that may jeopardize the tax-exempt status of the organization, including a variety of lobbying and political activities.

1. No individual may make any agreement to contribute any money, property, or services of any officer or employee at Springpoint's expense to any political candidate, party, organization, committee or individual in violation of any applicable law. Officers and employees may personally participate in and contribute to political organizations or campaigns, but they must do so as individuals, not as representatives of Springpoint, and they must use their own funds.
2. Where its experience may be helpful, Springpoint may publicly offer recommendations concerning legislation or regulations being considered. In addition, it may analyze and take public positions on issues that have a relationship to the operations of Springpoint when Springpoint's experience contributes to the understanding of such issues.
3. Springpoint has many contacts and dealings with governmental bodies and officials. All such contacts and transactions shall be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is absolutely prohibited. Any requests or demands by any governmental representative for any improper benefit should be immediately reported to Springpoint's General Counsel.

Standard 2.5 - Environmental

It is the policy of Springpoint to manage and operate its business in the manner which respects our environment and conserves natural resources. Springpoint employees will strive to utilize resources appropriately and efficiently, to recycle where possible, dispose of all waste in accordance with applicable laws and regulations, and to work cooperatively with the appropriate authorities to remedy any environmental contamination for which Springpoint may be responsible.

Standard 2.6 – Harassment, Discrimination, and Bullying

Springpoint believes that the fair and equitable treatment of employees, patients and other persons is critical to fulfilling its vision and goals.

Springpoint does not tolerate discrimination against any employee, applicant, residents and suppliers based on personal characteristics, such as race, color, national origin, religion, age, sex (gender), sexual orientation, physical or mental disability, reprisal or any other classification prohibited by law.

No form of harassment or discrimination on the basis of race, color, national origin, religion, age, sex (gender), sexual orientation, physical or mental disability, reprisal or any other classification prohibited by law. will be permitted. Each allegation of harassment or discrimination will be promptly investigated in accordance with applicable human resource policies.

Standard 2.7 – Safe Workplace

We are committed to a violence free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it to Human Resources immediately.

PRINCIPLE 3 - BUSINESS ETHICS

In furtherance of Springpoint’s commitment to the highest standards of business ethics and integrity, employees will accurately and honestly represent Springpoint and will not engage in any activity or scheme intended to defraud anyone of money, property or honest services.

The Standards set forth below are designed to provide guidance to ensure that Springpoint’s business activities reflect the high standards of business ethics and integrity. Employee conduct not specifically addressed by these standards must be consistent with Principle 2.

Standard 3.1 - Honest Communication

Springpoint requires candor and honesty from individuals in the performance of their responsibilities and in communication with our attorneys and auditors. No employee shall make false or misleading statements to any patient, person or entity doing business with Springpoint about other patients, persons or entities doing business or competing with Springpoint, or about the products or services of Springpoint or its competitors.

Standard 3.2 - Misappropriation of Proprietary Information

Springpoint employees shall not misappropriate confidential or proprietary information belonging to another person or entity nor utilize any publication, document, computer program, information or product in violation of a third party's interest in such product. All Springpoint employees are responsible to ensure they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws or licensing agreements. Employees shall not utilize confidential business information obtained from competitors, including customers' lists, price lists, contracts or other information in violation of a covenant not to compete, prior employment agreements, or in any other manner likely to provide an unfair competitive advantage to Springpoint.

Standard 3.3 - Fraud and Abuse (Standard 2.3 above)

PRINCIPLE 4 - CONFIDENTIALITY

Springpoint employees shall strive to maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards.

Springpoint and its employees are in possession of and have access to a broad variety of confidential, sensitive and proprietary information, the inappropriate release of which could be injurious to individuals, Springpoint's business associates and Springpoint itself. Every Springpoint employee has an obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

Standard 4.1 - Resident Information

All Springpoint employees have an obligation to maintain the confidentiality of resident information in accordance with all applicable laws and regulations, including but not limited to the Health Insurance Portability and Accountability Act of 1996, as amended (HIPAA). Employees shall refrain from revealing any personal or confidential information concerning patients or members unless supported by legitimate business or patient care purposes. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, employees should seek guidance from employee's supervisor or Springpoint's legal department.

Standard 4.2 - Proprietary Information

Information, ideas and intellectual property assets of Springpoint are important to organizational success. Information pertaining to Springpoint's competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with employees or third parties should be protected and shared only with employees having a need to know such information in order to perform their job responsibilities. Employees should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights and software is carefully maintained and managed to preserve and protect its value.

Standard 4.3 - Personnel Actions/Decisions

Salary, benefit and other personal information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Employees will exercise due care to prevent the release or sharing of information beyond those persons who may need such information to fulfill their job function. Nothing in the definition of confidentiality and propriety information prohibits you from discussing wages, hours, and other terms and conditions of employment consistent with your legal rights under, without limitation, the National Labor Act.

Standard 4.4 – Social Media

When we share information with the public, we must do so carefully and consistently. In all of our communications we should be as candid and transparent as possible while keeping in mind our responsibilities to protect confidentiality and privacy based on HIPAA law – refer to our HR Social Media Policy. This includes the use of social media as well as more traditional forms of oral and written communication.

Here are some examples of potential violations:

- Posting about employees that may be perceived as threats, harassment, discrimination or gossips that may affect performance
- Posting images and videos of residents without written consent
- Posting of gossip of patients
- Posting of any information that could allow an individual to be identified
- Sharing of photographs or images taken inside our communities which protected health information are visible

PRINCIPLE 5 - CONFLICTS OF INTEREST

We act in the best interest of Springpoint and carry out our duties with total objectivity. In our dealings with and on behalf of the organization, we hold ourselves to a strict rule of honest and fair dealing and conduct ourselves in accordance with laws, regulations, policies and employment agreements when applicable.

We do not use our positions, or knowledge gained as a result, in any manner that creates a conflict between the interest of Springpoint and ourselves.

Here are some examples of potential conflicts of interest:

- Direct reporting relationship between family members
- Using Springpoint property, information or resources for non-Springpoint purposes
- Making business decisions that could benefit family or friends
- Having a financial or ownership interest in an entity that competes with Springpoint
- Having financial or non-financial relationships that could appear to influence the independence of patient care decisions
- Failure to disclose personal relationships with clients, residents and vendors while conducting business with them.
- Sharing confidential information about Springpoint with a competitor.
- Dating or having a romantic relationship with a supervisor or client/resident
- Accepting favor, gifts or exchanges from clients, residents and vendors
- Issuing testimonials, endorsing, or promoting a vendor, payor, provider, product or service
- May not solicit or accept from any person or organization, directly or indirectly, money of anything for value if it could reasonably be expected to influence actions.

Standard 5.1 - Outside Financial Interests

While not all inclusive, the following will serve as a guide to the types of activities by a covered person, or household member of such person, which might cause conflicts of interest:

1. Ownership in or employment by any outside concern which does business with Springpoint. This does not apply to stock or other investments held in a publicly held corporation, *provided* the value of the stock or other investments does not exceed 5% of the corporation's stock. Springpoint may, following a review of the relevant facts, permit ownership interests which exceed these amounts if management concludes such ownership interests will not adversely impact Springpoint's business interest or the judgment of the covered person.
2. Conduct of any business not on behalf of Springpoint, with any Springpoint vendor, supplier, contractor, or agency, or any of their officers or employees.
3. Representation of Springpoint by a covered person in any transaction in which he or she or a household member has a substantial personal interest.
4. Disclosure or use of confidential, special or inside information of or about Springpoint, particularly for personal profit or advantage of the covered person or a household member.
5. Competition with Springpoint by a covered person, directly or indirectly, in the purchase, sale or ownership of property or property rights or interests, or business investment opportunities.

Standard 5.2 - Services for Competitors/Vendors

No covered person shall perform work or render services for any competitor of Springpoint, or for any organization with which Springpoint does business or which seeks to do business with Springpoint outside of the normal course of his/her employment with Springpoint, without disclosure and approval of the applicable supervisory individual or body.

Standard 5.3 - Participation on Boards of Trustees

1. A covered person must obtain approval from his/her supervisor prior to serving as a member of the Board of Trustees of any organization whose interests may conflict with those of Springpoint.
2. A covered person who is asked, or seeks to serve on the Board of Trustees of any organization whose interest would not impact Springpoint (for example, civic, charitable, fraternal and so forth) will not be required to obtain such approval.
3. A covered person must disclose all Board of Trustees activities in the annual Conflict of Interest disclosure statement/resolution.
4. Springpoint retains the right to prohibit membership on any Board of Trustees where such membership might conflict with best interest of Springpoint.
5. Questions regarding whether or not Board participation might present a conflict of interest should be discussed with a covered person's supervisor or supervisory body.

Standard 5.4 - Honoraria

Employees are, with the permission of their supervisor, encouraged to participate as faculty and speakers at educational programs and functions. However, any honoraria in excess of fifty dollars shall be turned over to Springpoint.

Standard 5.5- Fundraising

Employees responsible for Springpoint's fundraising program shall comply with all applicable standards, laws and regulations as more fully set forth in Springpoint's fundraising policies and procedures. Employees involved in fundraising for Springpoint shall not enter into any agreements or transactions in which the employee's interest conflicts with the interest of Springpoint or the donor. Employees shall ensure that the fundraising program merits the respect and trust of the general public, donors and prospective donors.

PRINCIPLE 6 - BUSINESS RELATIONSHIPS

Business transactions with vendors, contractors and other third parties shall be transacted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

The Standards set forth below are intended to guide key employees in determining the appropriateness of the listed activities or behaviors within the context of Springpoint business relationships, including relationships with vendors, providers, contractors, third party payors and government entities. It is the intent of Springpoint that this policy be construed broadly to avoid even the appearance of improper activity. If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, you should contact your supervisor or Springpoint's legal department.

Standard 6.1 - Gifts and Gratuities

It is Springpoint's desire to at all times preserve and protect its reputation and to avoid the appearance of impropriety.

1. **Gifts from Residents.** Employees are prohibited from *soliciting and/or accepting* tips, personal gratuities or gifts from any resident or resident's family member. If a patient or another individual wishes to present a monetary gift, they should be referred to the Executive Director of the facility.
2. **Gifts Influencing Decision-making.** Employees shall not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting Springpoint might be influenced. Similarly, the offer or giving of money, services or other things of value with the expectation of influencing the judgment or decision making process of any purchaser, supplier, customer, government official or other person by Springpoint is absolutely prohibited. Any such conduct must be reported immediately either to the employee's supervisor or to Springpoint's legal department.
3. **Gifts From Existing Vendors.** Employees may retain gifts from vendors which have a nominal value. (Springpoint has made no attempt to define "nominal" as a specific dollar value. Rather, Springpoint expects its employees to exercise good judgment and discretion in accepting gifts). If an employee has any concern whether a gift should be accepted, the employee should consult with his/her supervisor. To the extent possible, these gifts should be shared with the employees' co-workers. Employees shall not accept excessive gifts, meals, expensive entertainment or other offers of goods or services which have more than a nominal value nor may they solicit gifts from vendors, suppliers, contractors or other persons.
4. **Vendor Sponsored Entertainment.** At a vendor's invitation, an individual may accept meals or refreshments at the vendor's expense. Occasional attendance at a local theater or sporting event, or similar entertainment at vendor expense may also be accepted. In most circumstances, a regular business representative of the vendor should be in attendance with the employee.

Nothing in this policy shall prohibit a department or supervisor from establishing stricter rules relating to the acceptance of gifts, gratuities or other things of value from vendors.

Standard 6.2 - Workshops, seminars and training sessions

Attendance, at vendor expense, at seminars, workshops and training sessions is permitted only with the approval of an employee's supervisor.

Standard 6.3 - Contracting

Employees may not utilize "insider" information for any business activity conducted by or on behalf of Springpoint. All business relations with contractors must be conducted at arm's length both in fact and in appearance and in compliance with Springpoint policies and procedures. Employees must disclose personal relationships and business activities with contractor personnel, which may be construed by an impartial observer as influencing the employees' performance or duties. Employees have a responsibility to obtain clarification from management employees on questionable issues, which may arise and to comply, where applicable, with the Springpoint's conflict of interest policy.

Standard 6.4 - Business Inducements

Springpoint employees shall not seek to gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting or receiving any form of bribe or other improper payment is prohibited.

Appropriate commissions, rebates, discounts and allowances are customary and acceptable business inducements provided that they are approved by Springpoint management and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to whom the original agreement or invoice was made or issued. Such payments should not be made to individual employees or agents of business entities.

In addition, employees may provide gifts, entertainment and meals of nominal value to Springpoint customers, current and prospective business partners and other persons when such activities have a legitimate business purpose, are reasonable and consistent with all applicable laws.

PRINCIPLE 7 - PROTECTION OF ASSETS

All employees will strive to preserve and protect the corporation's assets by making prudent and effective use of Springpoint's resources and properly and accurately reporting its financial condition.

The Standards set forth below are intended to guide key employees by articulating Springpoint's expectations as they relate to activities or behaviors which may impact Springpoint's financial health or which reflect a reasonable and appropriate use of the assets of a nonprofit entity.

Standard 7.1 - Internal Control

Springpoint has established control standards and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable. All employees of Springpoint share the responsibility for maintaining and complying with required internal controls.

Standard 7.2 - Financial Reporting

All financial reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of Springpoint and may be in violation of applicable laws.

Standard 7.3 - Travel and Entertainment

Travel and entertainment expenses should be consistent with the employees' job responsibility and the organization's needs and resources. It is Springpoint's policy that an employee should not suffer a financial loss nor a financial gain as a result of business travel and entertainment. Employees are expected to exercise reasonable judgement in the use of Springpoint's assets and to spend the organization's assets as carefully as they would spend their own. Employees must also comply with Springpoint's policies relating to travel and entertainment expense.

Standard 7.4 - Personal Use of Corporate Assets

All employees are expected to refrain from converting assets of the organization to personal use. All property and business of the organization shall be conducted in the manner designed to further Springpoint's interest rather than the personal interest of an individual employee. Employees are prohibited from the unauthorized use or taking of Springpoint's equipment, supplies, materials or services. Prior to engaging in any activity on company time which will result in remuneration to the employee or the use of Springpoint's equipment, supplies, materials or services for personal or non-work related purposes, employees shall obtain the approval of the employee's supervisor or other management of Springpoint.

PRINCIPLE 8 – DIVERSITY, EQUITY AND INCLUSION

SPRINGPOINT IS COMMITTED TO WORKFORCE DIVERSITY, CREATING EQUITY ACROSS OUR SYSTEM AND FOSTERING AND ADVANCING A CULTURE OF INCLUSION.

We know that bringing diverse backgrounds, cultures, and perspectives together drives innovation which helps us better serve our clients and residents. Springpoint strives to achieve an inclusive work environment where differences and perspectives are valued and respected.

We value both collective and individual differences and ensuring diversity in our workforce helps foster a culture of inclusion and allows each person to thrive in a talent driven environment.

Diversity, Equity and Inclusion is everyone's responsibility at Springpoint. Every employee is responsible for:

- Respecting the dignity and diversity of all people.
- Creating an inclusive environment that is free from discrimination, harassment and bullying.
- Enhancing awareness of potential unconscious bias and how that might hinder our ability to be more inclusive and collaborative with one another.
- Focusing on conscious inclusion to be more intentional with actions to drive diversity, equity, and belonging.

PRINCIPAL 9 – SOCIAL ACCOUNTABILITY

Support our communities: We want to be known as a trusted neighbor in the communities where we live and operate. Springpoint has a Corporate Social Accountability Program because we believe in giving back to the greater good of the communities. If you volunteer to help local civic organizations, be sure that your participation does not interfere with your work or create a potential conflict of interest. Soliciting or pressuring customers, third-party service providers, or other team members to support your favorite charities or causes is not allowed.

ADMINISTRATION AND APPLICATION OF THIS CODE OF CONDUCT

Springpoint expects each person to whom this Code of Conduct applies, to abide by the Principles and Standards set forth herein and to conduct the business and affairs of Springpoint in a manner consistent with the general statement of principles set forth herein.

Failure to abide by this Code of Conduct or the guidelines for behavior which the Code of Conduct represents may lead to disciplinary action. For alleged violations of the Code of Conduct, Springpoint will weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the Code of Conduct, the egregiousness of the behavior, the employee's history with the organization and other factors which Springpoint deems relevant. Discipline for failure to abide by the Code of Conduct may, in Springpoint's discretion, range from verbal discipline up to and including termination. In the event that an employee is covered by the terms of a collective bargaining agreement, discipline shall be in accordance with the provisions of the collective bargaining agreement.

Nothing in this Code of Conduct is intended to nor shall be construed as providing any additional employment or contract rights to employees or other persons.

While Springpoint will generally attempt to communicate changes concurrent with or prior to the implementation of such changes, Springpoint reserves the right to modify, amend or alter the Code of Conduct without notice to any person or employee.

The elements of this Code of Conduct are supported at all levels of the organization. There is oversight by the Board of Trustees, the Chief Executive Officer and the Chief Corporate Compliance Officer. At each facility there is a Human Resource Director available. All of these individuals or groups are prepared to support you in meeting the standards set forth in this Code.

REPORTING QUALITY ASSURANCE/COMPLIANCE VIOLATIONS

To obtain guidance on a corporate compliance issue or to report a suspected violation, you may choose from several options. We encourage the resolution of issues, including human resources-related issues (e.g., payroll, fair treatment, and disciplinary issues) at a local level whenever possible. You may want to use the human resources related problem-solving procedure at your facility to resolve such issues. It is an expected good practice when you are comfortable with it and think it appropriate under the circumstances, to raise concerns first with your supervisor. Employees have a duty to, and shall cooperate in, internal investigations. Anyone concerned about the appropriateness of a particular business activity or who is unsure of the correct procedures to follow under Springpoint policies should consult with his/her supervisor or Community Compliance Coordinator/Community Human Resource Director, for clarification first. If this is uncomfortable or inappropriate, another option is to discuss the situation with another member of the management team or the executive director of your facility. You are always free to contact the Chief Compliance Officer, other senior management or the ComplianceLine at 1-800-876-2023.

Springpoint will investigate all reports of alleged violations. If the results of an investigation indicate corrective action is required, Springpoint will decide the appropriate steps to take, including employee discipline, dismissal and possible legal proceedings. If appropriate, the investigation may be turned over to outside authorities and outside investigators may assist in the investigation. Springpoint will make every effort to maintain, to the degree possible, confidentiality of the identity of any individual who reports possible misconduct.

WHO NEEDS TO FOLLOW OUR CODE?

Our Code applies to all employees, including officers, as well as directors of Springpoint and its subsidiaries, regardless of location or whether the employee is classified as regular, part-time, volunteer or flexible.

In addition, we look for third-party service providers that share our commitment to integrity, customer service, ethics, compliance, and behavior that is consistent with our Code. We will take the appropriate actions where we believe they have not met our standards, their contractual obligations, or have violated any applicable law, rule, or regulation.

INFORMATION ABOUT THE SPRINGPOINT COMPLIANCE HOTLINE

Springpoint encourages all employees and affiliates to voice any questions or concerns about ethics and compliance issues directly with their supervisor. We have a responsibility to protect the reputation and integrity of Springpoint. If you see or suspect illegal or unethical behavior involving Springpoint, including possible violations of this Code, or violations of laws, rules or regulations—whether it relates to you, your manager, a co-worker, a customer or a third-party service provider it must be reported to one of the following:

- Your supervisor;
- Another supervisor;
- Human Resources/Community Compliance Coordinator;
- The Quality Assurance/Compliance Officer; or
- The 24/7 toll-free Compliance Line:1-800-876-2023

HOW TO USE THE COMPLIANCE LINE

Employees may report concerns to the Compliance Line anonymously or by identifying themselves. No tracking, tracing or recording devices will be used. Calls will be assigned a risk assessment number which callers may use to check on the status of their question or concern. The communication specialist who answers the phone will forward the question or concern to the Corporate Compliance Officer for review and action. The caller will be given a time and date to call back and check on the status of their question or concern.

WHAT KINDS OF CONDUCT SHOULD BE REPORTED?

- Resident abuse, neglect, misappropriation of property
- Quality of care issues
- Criminal activities
- Bribes or kickbacks
- Discrimination or harassment
- Dishonest communication
- Alteration of records
- Disclosure of confidential residents and employee records
- Conflicts of interest
- Inappropriate gifts, entertainment, or business gratuities
- Theft or misuse of company assets/property
- Fraudulent or false claims for services billed
- Environment, health or safety issues
- Any other concern about questionable activity or practice

SHOULD CALLERS MAKE REPORTS EVEN THOUGH THEY DO NOT KNOW ALL THE DETAILS?

Any concern can be reported. Even if the information is incomplete, it might alert the company to a problem and enable a corrective plan of action to be taken more rapidly.

WILL AN EMPLOYEE OR AN AFFILIATE EVER BE PUNISHED FOR ASKING A QUESTION OR REPORTING A CONCERN?

SPRINGPOINT HAS A POLICY THAT FORBIDS RETALIATORY ACTION AGAINST ANY EMPLOYEE OR OTHER PERSON WHO REPORTS AND ETHICS OR COMPLIANCE CONCERN IN GOOD FAITH.

WE DO NOT TOLERATE RETALIATION

We do not engage in or tolerate retaliation of any kind against anyone for providing information in good faith about suspected unethical or illegal activities, including possible violations of this Code, violations of laws, rules, or regulations by others, or concerns regarding accounting, internal accounting controls, or auditing matters. If you think that you or someone you know has been retaliated against, contact any of the resources listed in this Code. Please review our No RETALIATION POLICY.

OUR FINAL THOUGHT:

Our Codes cover many of the ethics and business conduct topics that we are likely to face in our work, but no code can cover every possible situation. That is why it is important to remember that you have other resources in addition to our Code that you can use to help you make good decisions: The most important resource is you. Rely on your experience and good judgment. But remember, in order to make informed decisions you must know and understand the policies, laws and regulations - especially those that apply to your job.

Always keep our Mission, Vision & Values in mind. They can help you stay on track, make the right decisions, and be clear about our priorities. In any situation if you're not sure what to do, don't be afraid to ask questions and get help. We encourage all employees including vendors, business partners and consultants to report concerns regarding possible violations of the Code, laws, rules, regulations or company policies and practices to the Resources listed in this policy.



Acknowledgment of Receipt and Understanding of Springpoint Code of Conduct

EMPLOYEE/VOLUNTEER/VENDOR NAME:

Print Name

By signing below, the undersigned acknowledges that the undersigned has received and understands the Springpoint Code of Conduct, as revised on April 18, 2022.

EMPLOYEE/VOLUNTEER/VENDOR

Signature: _____

Date: ___/___/___