

Edgewood Retirement Community, Inc.

Code of Conduct

Edgewood Retirement Community, Inc. is committed to managing and delivering quality service while upholding legal and ethical principles governing a responsible and caring workplace.

Edgewood Retirement Community, Inc. will fully comply with laws, regulations and guidelines applicable to federal healthcare programs. Edgewood Retirement Community, Inc. strives to conduct its business consistent with the highest ethical standards and strives to prevent fraud and abuse.

In order to maintain these standards, Edgewood Retirement Community, Inc. works with its employees to educate them regarding its standards. Edgewood Retirement Community, Inc. expects its employees to obey all applicable laws and regulations and to conduct themselves so as to avoid conflicts of interest.

The Compliance Manual sets forth Edgewood's standards, policies and procedures regarding compliance with the applicable laws and regulations relating to financial relationships among healthcare providers or other potential sources of business referrals. It is designed to ensure that Edgewood's business and billing practices comply with applicable laws and regulations.

It is Edgewood's policy to adhere to the following:

All Employees shall perform their duties to the best of their abilities while obeying all laws, regulations, policies and procedures, which apply to their workplace. Employees will fully comply with laws, regulations and guidelines applicable to federal healthcare programs.

Improper Payments: No employee shall engage, either directly or indirectly, in any corrupt business practice, including bribery, kickbacks or payoffs, intended to induce, influence, or reward favorable decisions of any customer, contractor or vendor, or any other person in a position to benefit Edgewood Retirement Community, Inc. or the employee in any way. No employee shall make or offer to make any payment or provide any other thing of value to another person with the understanding or intention that such payment is to be used for an unlawful or improper purpose.

Business Entertainment and Gifts: Edgewood Retirement Community, Inc. personnel may provide and accept ordinary and reasonable business entertainment and gifts of nominal value, (e.g. tickets to sporting events or concerts, meals and similar gift items) provided that such entertainment and gifts do not violate the laws of the locale in which the business is transacted and are not given for the purpose of influencing the business behavior of the recipient. In any event, such ordinary and reasonable entertainment and gifts may be given only with the prior approval of the officer, department head, or administrator for whom the employee works. Cash gifts to physician or other referral sources are prohibited. Non-cash gifts to or from referral sources that exceed reasonable personal entertainment or have a value exceeding \$50 each, or total more than \$50 in a calendar year are prohibited.

If an employee or a member of employee's immediate family has a financial interest of 5% or greater or a personal interest with Edgewood Retirement Community, Inc. customers, vendors and competitors, as defined in the employee handbook, the employee shall disclose the nature and extent of such relationship to the Corporate Compliance Officer.

Employees have a duty to report any activity or occurrence, which employees believe may violate the provisions of Edgewood's Code of Conduct. Disclosure of any real or perceived issues that may arise, before they occur, must be reported to the Executive Director, Administrator, and/or Corporate Compliance Officer. Reporting shall be done promptly through a report to the Compliance Officer or designee. Reporting may be done anonymously. The identity of the reporting person will not be disclosed unless required by a federal agency.

Employees shall participate in scheduled training regarding Edgewood's Compliance Program, which will include applicable state and federal laws, regulations and guidelines applicable to federal healthcare programs.

Edgewood Retirement Community, Inc. is committed to assuring that its business is managed in a fiscally sound basis in accordance with all applicable state and federal laws and regulation including insuring appropriate billing codes are utilized for all third party reimbursement.

Edgewood Retirement Community, Inc. is committed to maintaining reasonable and appropriate safeguards to ensure confidentiality and privacy of resident health information. Employees shall not disclose medical or personal information except in accordance with Edgewood's applicable policies and procedures.

CODE OF CONDUCT LAWS

The Anti-Kickback Statute: The Anti-Kickback Statute is a federal law which prohibits any person from knowingly and willfully soliciting or receiving, or knowingly and willfully offering or giving kickbacks, bribes or rebates, directly or indirectly, in return for a referral for items or services covered by federal healthcare programs. This federal law is broadly interpreted to include anything of value given or received in exchange for business reimbursed by the federal healthcare programs such as Medicare and Medicaid.

The Health Insurance Portability and Accountability Act: The Health Insurance Portability and Accountability Act, commonly referred to as HIPAA, is a federal law which, places requirements on healthcare providers who transmit health information electronically. A healthcare provider is any entity which receives payment for providing healthcare services and supplies. HIPAA imposes civil and criminal penalties on a person who knowingly obtains or discloses individually identifiable health information under certain circumstances. Healthcare providers are required to maintain reasonable and appropriate administrative and physical safeguards to ensure the integrity and confidentiality of such information and to protect against any reasonably anticipated threats or hazards to the security of the information and unauthorized uses or disclosures of information.

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Code of Conduct Non-Employee/Vendor Acknowledgement

I have received and reviewed a copy of the Code of Conduct of Edgewood Retirement Community, Inc. that operates a retirement community known as Edgewood that provides skilled nursing care in the Meadows. I understand, acknowledge, and agree to abide by the Code of Conduct in the performance of my duties as an Edgewood vendor

Further, except as stated below, as of this date I have no knowledge of any transactions or events that appear to violate the Code of Conduct. I acknowledge my affirmative obligation to adhere to the principles and standards of the Code of Conduct and to report any violations or suspected violations of the Code of Conduct to an Officer of Edgewood or Edgewood's compliance hotline at 1-800-455-9016 or in writing to Edgewood's compliance officer.

Signature of Vendor

Print Name

Date