

Subject: Business Code of Ethics	Policy Number: 1005
Scope: Leadership and Governance	Effective Date: June 1, 2007 Revised/Reviewed: February 7, 2008; February 2, 2009; April 20, 2010; February 16, 2011; June 26, 2012; October 21, 2013; March 10, 2014; August 27, 2015; January 2, 2016; April 11, 2016; September 24, 2016

POLICY: Business Ethical Code of Conduct

It is the policy of Grace Harbour, Inc. to have policies in place that not only guide the delivery of services and professional roles, but also human resources, business, and marketing areas of the organization. It is the responsibility of each employee, including contract and volunteer, to uphold the organizations policies on ethics in addition to his or her own professional ethics. The following goals are intended to govern the business code of ethics of the organization.

GOALS:

1. Human Resources: Providing competent, caring, and ethical staff committed to working with each other as a team.
2. Business: To provide the best quality of services to our clients and their family members and maintain a close working relationship with the community to reduce stigma while maintaining financial solvency to ensure continuity of care.
3. Service Delivery, including: conflicts of interest, exchange of gifts, money, and gratuities, personal fund raising, personal property, setting boundaries, and witnessing of documents.
4. Marketing: To inform consumers, family members, stakeholders, and the community about services that encourages the recipient of information to use or access the particular service.
5. Professional Responsibility: Staff shall adhere to all company policy and procedures, job responsibilities/descriptions, applicable ethical codes, state licensing practice laws, and all local, state, and federal regulations.

PROCEDURE:

HUMAN RESOURCES: Grace Harbour, Inc. shall follow its policies and procedures for hiring/ firing, training, and discipline of all of its employees, including contract, volunteers, and business associates. This shall include at minimum non-discrimination practices, written ethical codes for professional conduct and service delivery, employee improvement programs, and competency-based training/education. It is the responsibility of the Director of Operations to oversee the Human Resource Coordinator in conducting all human resources matters.

Grace Harbour strives to recruit, manage, develop and retain employees who meet the needs of the clients served and contribute to the accomplishment of the agency's mission. In doing so we strive to ensure compliance with Equal Employment Opportunity and Workforce Diversity guidelines and encourage hiring of qualified candidates who reflect

the diversity of the community and population served. The Leadership and staff of Grace Harbour will not discriminate against any person in recruitment, examination, appointment, training, promotion, retention, or any other personnel action because of race, color, national origin, gender, age, disability, marital status, sexual orientation, political affiliation, religion, and receipt of public assistance or other factors which cannot be lawfully used as the basis for employment decisions.

BUSINESS: Grace Harbour, Inc. shall follow legal and ethical principles in its provision of services. This shall include at minimum adherence to professional codes of conduct, involvement with the community, and compliance with internal control practices outlined in the financial plan and risk management policies and procedures.

- It is the responsibility of the Director of Operations to provide education to the community and represent the organization in its business ventures.
- It is the responsibility of the CEO, Clinical Director and Director of Operations to stay current on legal and ethical standards, to communicate this information with each other and staff, and ensure compliance with these laws and standards.
- It is the responsibility of the CEO to review and establish an annual budget, and assume responsibility in the planning related to the organization's financial viability.

MARKETING: Grace Harbour, Inc. shall in no way misrepresent services, fees, or outcomes in its marketing efforts. Grace Harbour, Inc. shall not reveal any protected health information of its consumers in its marketing practices.

- It is the responsibility of the Director of Operations to advertise its services, fees, and other information needed to assist the community in its decision making efforts. The Director of Operations shall consider marketing fees in the establishment of the annual budget.
- It is the responsibility of each employee to communicate the organization's fees for services to consumers, family members, and other stakeholders through face to face, telephone, and other communications.
- It is the responsibility of each employee of Grace Harbour, Inc. to adhere to confidentiality policies and procedures.
- It is the responsibility of the Director of Operations to coordinate outcomes management efforts to assist in Grace Harbour, Inc.'s marketing responsibilities.

CONTRACTUAL RELATIONSHIPS: As part of standard business practices, Grace Harbour may enter into contractual arrangements for appropriate goods or services. The following guidelines will be adhered to:

Contracts will be executed by the CEO or designee and the contracting party; each legally qualified to commit the contracting entity to a binding contract. The contract will clearly establish:

- The nature of services to be performed.
- The period of the agreement.
- If applicable, the conditions under which the contract will be reviewed, renewed and/or terminated and venue for addressing perceived breaches of the contract.
- The contract clearly states financial arrangements.

- The contract addresses necessary accounting procedures for revenue and expenditures.
- If applicable, Federal and State requirements are adequately addressed within the scope of the contract

SERVICE DELIVERY:

- **Conflicts of Interest:** No employee shall transact in any activities which would create a personal, business or procurement conflict of interest. Grace Harbour employees should be alert to and avoid conflicts of interest that interfere with the exercise of professional discretion and impartial judgment. Employees should inform clients when a real or potential conflict of interest arises and take reasonable steps to resolve the issue in a manner that makes the clients' interests primary and protects clients' interests to the greatest extent possible. In some cases, protecting clients' interests may require termination of the professional relationship with proper referral of the client. Agency staff should not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, or business interests.
- **Exchange of gifts, money, and gratuities:** No employee or agent acting on behalf of the agency may accept anything of value from any vendor which previously or currently provides goods or services to the agency, or from any prospective vendor who is or may be soliciting business from this agency. Employees should always interact "therapeutically" in their relationship with clients. Employees do not give or accept items (money, personal items, cd's, cigarettes, clothes, etc.) from or to clients. Agency staff members do not allow pictures to be taken or exchanged. Agency staff should not have any reason to accept money or gratuities from clients, external agencies, funders, or other vendors. If an employee receives a gift during service for the agency from an external vendor or referral source, the gift should be turned in to the employee's supervisor and considered a donation.
- **Personal fund raising:** No employee shall participate in personal fund raising without approval from the CEO. Employees shall not engage in coercive solicitation of coworkers such as seeking donations, encouraging purchases or taking a position on an issue outside the workplace. Employees receiving unwanted solicitations are encouraged to address the issue with their coworker and/or report the matter to their supervisor and/or management.
- **Personal property:** All employees shall respect property of persons served, all employees shall keep their personal property in their possession and locked at all times. Grace Harbour cannot be responsible for loss of personal property that is damaged or stolen. Employees are responsible for personal property/items/belongings brought to the workplace. Grace Harbour prohibits any items on the premises or worksite that are sexually suggestive, offensive, or demeaning to specific individuals or groups, along with firearms or weapons. All personal property may be inspected for purposes of enforcing the organization's policies and to protect against theft.
- **Setting boundaries:** All employees shall receive training regarding setting boundaries with clients, families, colleagues and community members to ensure that the clients best interest are first and foremost. Grace Harbour employees should not engage in dual or multiple relationships with clients or former clients, in which there is a risk of exploitation or potential harm to the client. In instances when dual or multiple

relationships are unavoidable, agency staff should take steps to protect clients and are responsible for setting clear, appropriate, and culturally sensitive boundaries.

- Witnessing of documents: No employee shall witness documents such as powers of attorney, guardianship or advance directives without prior approval from the CEO. In any situation where deemed necessary, the agency will regard the witnessing of signature to be accurate and accountable. When required, the signature may be witnessed by a notary public. Generally a person chosen to witness a document should have no financial or other interest in an agreement. A neutral third party is the best choice. The witness is not usually required to know or understand the contents of the document. A witness must be of legal age and mentally capable.

PROFESSIONAL RESPONSIBILITIES: Staff shall adhere to all company policy and procedures, job responsibilities/descriptions, applicable ethical codes, state licensing practice laws, and all local, state, and federal regulations. Grace Harbour's goal is to establish a high standard of performance, professionalism, and ethical conduct. We create an environment that fosters ethical behavior, where no employee will ever feel the need to compromise personal integrity to help achieve our mission.

The code of conduct is applicable to all staff, consultants and contractual employees, regardless of their professional functions, the settings in which they work, or the population they serve. To that end:

- Staff will strictly adhere to established rules of confidentiality regarding all records, materials and knowledge concerning persons served in accordance with all current government and program regulations.
- While working under Grace Harbour's Ethical Code of Conduct, the staff, consultants and contractual employees must be conscientious, committed, and honest in their work and all duties related to their respective jobs within the organization.

In addition, employees are expected to comply with the ethical codes of conduct outlined by their respective licensing or certifying boards.

WASTE, FRAUD, ABUSE AND OTHER WRONGDOINGS: Employees, stakeholders, and contractors representing Grace Harbour should not participate in, condone, or be associated with dishonesty, fraud, or deception.

VIOLATIONS OF ETHICS: Any person who, in good faith, reports an ethical violation of this business code of conduct shall not be retaliated against in any way. Violations of ethics shall follow the procedure found in the Complaints/ Grievance Policy and Procedure.

REPORTING WRONGDOINGS, FRAUD, ABUSE, GRIEVANCES: When problems arise, it is hoped that a resolution can be reached informally, promptly, and equitably at the level of the staff's immediate supervisor. Reports of wrongdoing will be investigated within 48 hours of report. No employee will be penalized or retaliated against for reporting negligence, wrongdoing, fraud, abuse, harassment or other such incidents.

Employees who believe they are aggrieved may file a grievance. Every effort will be made to resolve the matter at the first or informal stage. Information on how to file a grievance can be located in this Policy and Procedure manual in policy # 4023. This policy also indicates the timeframe for results.

DELIVERY OF ETHICAL CODE OF CONDUCT: All clients are informed of their rights and responsibilities, and the agency's ethical standards, at the time of admission and as needed during the course of treatment.

Staff/consultants/students/volunteers and Board Members are informed of their rights and responsibilities and provided a copy of the Ethical Code of Conduct during their initial orientation.

The community-at-large is informed of these standards by way of the agency's website and/or during stakeholder meetings.

In the event an employee has questions regarding this Code of Conduct, they should seek out advice from a Supervisor, Management Team member, or Manager of Human Resources for clarification.

ADVOCACY: Grace Harbour continues to advocate for clients, personnel, and other community stakeholders. Advocacy efforts include conducting and participating in public education or activities that promote the elimination of discrimination and stigma for the persons served. Grace Harbour incorporates the use of “people first” language in its publications, operations, and activities. Grace Harbour personnel participate in a variety of public education efforts, community boards and committees, and public awareness. Grace Harbour's advocacy efforts also include providing oral testimony, and developing and submitting position statements that support the needs of persons served and/or the needs for policy revisions at the local, state, and federal levels. Grace Harbour works in collaboration with other organizations to coordinate our advocacy efforts on behalf of not only persons served, but Grace Harbour's general geographic service area as well. Grace Harbour will continue to demonstrate a commitment and value for advocacy services on behalf of persons served through a number of venues, including the recipient rights process, corporate responsibility strategies, and as a part of ongoing service delivery.

CORPORATE CITIZENSHIP: Grace Harbour encourages corporate responsibility at all levels of the organization. Corporate responsibility demonstrates what an organization stands for including its ethical, social, and environmental values. It involves creating, communicating, and balancing value for all stakeholders. Corporate responsibility assists in: advocating for the persons served; promoting ethical business practices; developing efficiency as an organization; and considering the impact of organizational activities on persons served, personnel, other stakeholders, and the environment. The participation of staff in corporate responsibility activities requires communicating with the CEO and receiving approval from the CEO for corporate responsibility activities that must be conducted during the course of the regular work day. Grace Harbour provides reasonable accommodations to promote equal opportunities for participation throughout all levels of the organization.