



National Lutheran
Communities & Services

Compliance and Ethics Program

CODE OF CONDUCT



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National Lutheran
Communities & Services

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Code of Conduct

National Lutheran Communities & Services (NLCS) operates communities and services within Maryland and Virginia and abides by the laws and regulations of those states. As a part of our team, you must follow our Compliance and Ethics Program and the Code of Conduct. Our team includes individuals who provide care and services throughout the organization as well as those who support our work through contracts and other agreements. Senior living organizations like ours must follow many rules and regulations from both the state and federal governments. This Code of Conduct helps us understand how our actions, individually and collectively, support compliance with applicable laws and standards, ensure high-quality care and services, and prevent fraud, waste, and abuse.

Our Compliance Officer is Therese Provencher.

Our High-Level Official is Cynthia (“Cyndi”) Walters.

NLCS Core Values

At the heart of NLCS lies a commitment to core values that guide our actions, shape our culture and drive our success. These values are not just words on a page but principles that we live by every day. They reflect who we are, what we stand for, and how we aspire to make a positive impact on the world around us. Our values of Purposeful Compassion, Pursuing Excellence, Embracing Agility and Respectful Collaboration form the foundation of our mission and vision. They inspire us to be our best selves, foster a supportive and inclusive environment and continuously strive for improvement.

Purposeful Compassion

1. Reflect our faith-based mission by being kind, caring and considerate toward everyone, ensuring that individuals feel supported, understood and valued.
2. Demonstrate empathy, understanding, and genuine concern for others.
3. Consider the thoughts, feelings and experiences of others to create a sense of belonging and connectedness.
4. Make a positive difference for everyone around us.
5. Prioritize the well-being of team members, those we serve, and ourselves, fostering a culture of support and trust.
6. Treat others as they want to be treated.
7. Acknowledge and appreciate the efforts and achievements of colleagues.

Pursuing Excellence

1. Go above and beyond in all tasks and continuously strive for improvement.
2. Be curious and proactively seek solutions and workarounds to challenges to promote creative problem-solving.
3. Actively give and receive feedback, turning mistakes into learning and demonstrating positive change.
4. Anticipate and address the needs of those we serve.
5. Be self-motivated and dependable, take initiative and demonstrate a strong work ethic.
6. Deliver quality work and improve services and communication daily.
7. Demonstrate excellent resource stewardship.
8. Inspire others to be their best self and pursue their purpose.

Embracing Agility

1. Adapt quickly to change by embracing new situations, technologies or processes by viewing change as an opportunity.
2. Demonstrate flexibility by navigating uncertain or dynamic situations by taking on different roles or tasks as needed, even if they fall outside your usual job description.
3. Thrive in uncertainty by being resilient and functioning effectively in unclear situations, making progress even when not all details are known.
4. Pursue continuous learning and actively seek opportunities to learn new skills, stay updated on industry trends, and use feedback to improve performance.
5. Make informed decisions quickly to balance the need for speed with thoughtful consideration of available information.
6. Maintain customer focus by adapting work to meet changing customer needs or market demands.

7. Experiment and learn by trying new approaches, test hypotheses and learn from both successes and failures.

Respectful Collaboration

1. Actively listen to understand others, being open-minded to diverse perspectives and ideas.
2. Seek input from others and foster a supportive environment where everyone's ideas are considered.
3. Collaborate with others in the exploration of innovative solutions.
4. Foster strong relationships, minimize misunderstandings and promote a culture of respect and inclusivity based on recognizing and valuing the contributions of others.
5. Work effectively with diverse groups of people, breaking down silos and fostering cross-functional cooperation.
6. Encourage open and honest dialogue where all team members feel comfortable sharing their ideas and concerns.
7. Providing and receiving feedback in a constructive manner that focuses on improvement rather than criticism.
8. Take responsibility for our actions and commitments to the team.

Dear Team Members,

Thank you for the care, compassion and commitment you bring to NLCS each day. Our mission is carried out not only through the services we provide, but through the many decisions—large and small—that reflect our values, our faith-based heritage and our responsibility to one another and to those we serve.

NLCS has a long tradition of providing services to older adults in a way that demonstrates Christian love, compassion, dignity and respect. We are grateful for the trust placed in us by residents, families, colleagues, partners and the broader communities we serve. Protecting that trust requires that we act with integrity, follow applicable laws and regulations and make decisions that are both ethical and consistent with who we are as an organization.

As health care and senior living continue to change, our commitment to doing what is right remains constant. Our Compliance and Ethics Program, including our Compliance Plan, policies and procedures and this Code of Conduct, helps guide us in meeting our legal, regulatory, ethical and organizational responsibilities. The Code of Conduct is not simply a set of rules; it is a shared guide for how we support one another in making wise, fair, honest and compliant decisions.

Each of us has a role in protecting the culture of trust, respect, accountability and compassion that makes our mission possible. The Code of Conduct does not replace personal judgment or individual responsibility. Rather, it helps explain our shared expectations and highlights areas where improper, careless or unwise decisions could harm residents, team members, our work environment or the organization. When questions arise, I encourage you to seek guidance, speak up and use the resources available through our Compliance and Ethics Program.

I am deeply grateful for the integrity, compassion and dedication you bring to this work. Thank you for helping NLCS remain a place where residents are honored, families are supported, colleagues are respected and our mission is lived with purpose each day.

Sincerely,

Cyndi Walters
President & CEO

Introduction

Our **Code of Conduct** is a guide to appropriate workplace behavior. Refer to this guide whenever you are unsure how to make the right decision(s) or respond to a situation. Team members and individuals all share a commitment to legal, ethical and professional conduct in the workplace. This Code of Conduct is one of three documents that guide our work. For more detailed information, you can read the **Compliance Plan** and the **Compliance Policies and Procedures**. The Compliance Plan and Code of Conduct include the federal, state and local laws we must follow.

Our Responsibilities

As part of our team, we each share a responsibility and commitment to our residents, their families and each other.

As part of your commitment to our team, it's important that you always make legal and ethical decisions. Additionally, if you see anyone else on the team violating the Code of Conduct, it's your responsibility to report those violations to the compliance officer. Reporting violations of the Code of Conduct is not optional. **You must report anything you see that may be unethical, illegal or unprofessional.** Our reporting process includes several ways for you to share any concerns you may identify.

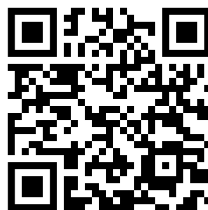
The Reporting Process

There are many ways to report a concern. You may always call the Compliance Line at 800-211-2713 or file a report using one of the following methods:

- Report to a supervisor/coach. They are most familiar with the laws, regulations and policies that relate to your work.
- Report to a member of the leadership team, seeking out another or someone from Talent & Culture.
- Contact the Compliance Officer or a member of the ECRM Committee.
- Call the toll-free compliance line, which is available 24/7.

- Scan the QR code on the compliance posters, which links to the compliance line portal.

Compliance Hotline- 800-211-2713



All reports to the Compliance Line are confidential, and you may choose to report ANONYMOUSLY.

The Compliance Line is available 24 hours a day, 7 days a week, for callers to report compliance-related issues. To ensure anonymity, the hotline is answered by a team member at AQORD Compliance Collaborative, not an NLCS team member. Concerns that are reported to the Compliance Line are taken seriously. Our culture is to ensure that there is no retaliation for bringing issues forward.

You can make calls to the Compliance Line without fear of reprisal, retaliation, or punishment for your actions taken in good faith. Anyone, including a supervisor/coach, who retaliates against an individual or entity for contacting the Compliance Line or for reporting a compliance issue in any other manner will be disciplined.

Retaliation against individuals who raise concerns, participate in investigations, cooperate in audits, or report suspected violations in good faith is strictly prohibited.

Resident-Centered Care & Rights

The **foundation for positive quality of care and quality of life** is understanding and honoring resident rights. As we provide care and services, it is important to respect residents' rights. This includes:

- Always treating residents equally and in respectful ways, preserving their dignity, autonomy, self-esteem and civil rights.
- Protecting resident privacy and confidentiality, particularly with regard to medical, financial or personal information as required by HIPAA.
- Respecting and protecting the personal property and money of all residents from

loss, theft, improper use and damage.

- Ensuring that residents and their legal representatives understand and participate in decisions about their care and treatment.
- Protecting every resident from physical, emotional, verbal, sexual or mental abuse or neglect. Any team member who abuses or neglects a resident will be terminated. If you witness any form of abuse, you must report it immediately to your supervisor/coach.

NLCS will not tolerate any type of resident abuse or neglect at any time.

- Providing the individual needs of our residents and developing care plans based upon their assessed needs.
- Monitoring our services to ensure that our residents receive quality services through Quality Assurance and QAPI.
- Assuring that our team members are qualified with appropriate licenses and experience.
- Maintaining our policies, procedures and practices are current and in line with the rules and laws we need to follow.
- Completing accurate and timely documentation and billing for the services provided.

Professional Responsibilities

As an employer, we are committed to providing a workplace that is respectful, inclusive, and free from discrimination and harassment. We follow fair and equitable employment practices and make employment decisions in accordance with applicable federal, state and local laws.

To keep residents safe, we screen all team members against required databases. As long as you work here, you must immediately tell your supervisor/coach if any of your actions inside or outside of work might affect your employment. You must report any convictions, revocation of professional licenses, exclusions or other events that may affect your ability to perform your job or meet regulatory requirements.

The professional, responsible and ethical behavior of every team member reflects directly on our reputation. As a team member, you must strive to make honest, professional decisions every day.

If you are a team member with a **professional license**, it's your responsibility to ensure you comply with all applicable licensing, credentialing and certification requirements, and to keep them current and in good standing.

We will not tolerate any form of **sexual harassment or violence** in the workplace. Additionally, team members may not supervise or be supervised by anyone with whom they have a close personal relationship.

NLCS is committed to maintaining a workplace free from threats, intimidation, harassment and violence. Team members are expected to treat others respectfully and report any concerns regarding workplace violence, threatening behavior or unsafe conditions.

You must follow our safety protocols, which are here to protect you and the residents, including, but not limited to, our emergency plans, hazardous materials and environmental policies. Let your supervisor/coach know of any potential hazards immediately.

Safety in the workplace includes refraining from using any substances that impair your ability to do your job. NLCS prohibits the possession, use, distribution, or sale of alcohol, marijuana (including medical and recreational cannabis), or illegal drugs on company premises, during work hours, or while conducting company business. We have the right to screen and discipline any team member suspected of violating the drug and alcohol policy.

Governance & Oversight

We are committed to ensuring our organization remains in **compliance** with all applicable federal and state laws. As a team member, you must also help our organization always remain in good standing with regard to our business practices.

During the course of your job, you may have access to confidential and proprietary information. **Proprietary and confidential** information includes resident, employee, applicant, volunteer, business, financial, operational, medical and organizational information, as well as policies and procedures, compensation information and marketing or advertising plans. Confidential or proprietary information should not be accessed, used or disclosed except as required to perform your job responsibilities or as otherwise authorized.

Team members may not accept **tips, gratuities or gifts** from residents, prospective residents or their families. Likewise, you may not give residents gifts. Gifts include any business or professional courtesies, including entertainment, or any goods or services worth more than \$5 per item.

Team members must always avoid conflicts of interest. A conflict of interest occurs when your personal interests may interfere with your ability to make good decisions for NLCS. If you are unsure if a situation or relationship is a conflict of interest, talk with your supervisor/coach.

Throughout the course of your job, you may use our **computer systems and networks**. You have **no expectation of privacy** while using our computer systems and using them improperly or illegally is a violation of the Code of Conduct. When using your work computer to create documents, records, emails, medical records, billing records and financial records, team members must never falsify or alter any document in an illegal or unethical way.

Team members must use technology, artificial intelligence tools and organizational information systems responsibly and in accordance with organizational policies. Information entered into or generated by these tools must be reviewed for accuracy, confidentiality and appropriate business use.

We use **marketing and advertising** to educate the public about our community services, activities and opportunities. All marketing and advertising materials are truthful and informative and are designed to be honest and accurate. Team members and individuals often have **relationships** with other healthcare providers and referral sources. All relationships with these professionals must be open, honest and legal.

We are required to follow many federal, state and local laws, often subject to change. Management will communicate about these changes when they occur and educate team members and individuals as needed. It's your job to read these **updates**, so you always have the most up-to-date information.

We are committed to **ethical and honest billing practices**. All team members must make truthful, accurate and complete statements and submissions for billing. We have zero tolerance for deliberately false or inaccurate coding or billing. Any team member who knowingly submits a false claim or provides information that could result in a false claim may be disciplined up to and including termination. Additionally, if you witness or suspect another team member or an individual of making false billing claims, you must report the activity to your supervisor/coach or the compliance officer/designee.

We will take **disciplinary action** against a team member who violates this Code of Conduct, the Compliance and Ethics Program, the supporting policies and procedures, and applicable federal, state and local laws. Disciplinary action could include termination of employment or business relationships, civil penalties, and/or a criminal investigation. We may also initiate disciplinary action against any team member who **retaliates** against another team member, in accordance with the Code of Conduct and applicable laws.

You are valued here. We trust you to always make ethical and honest decisions during your employment here. If ever you have a question about compliance or ethics in your decision-making, please discuss the issue with your supervisor/coach or our compliance officer.

The Compliance and Ethics Program is critical to our continued success. The Code of Conduct and the Compliance and Ethics Program set standards for our legal, professional, and ethical conduct. Some key points to remember are:

- We are committed to personal and organizational integrity, acting in good faith, and being accountable for our actions.
- The Code of Conduct and the Compliance and Ethics Program prepare us to deal with the growing complexity of the ethical, professional, and legal requirements governing healthcare in the Life Plan Community environments.

- The Compliance and Ethics Program is an ongoing initiative designed to foster a supportive work environment, provide standards for clinical and business conduct and offer education and training opportunities for team members.

The success of the Compliance Program depends on our commitment to act with integrity, both personally and as an organization. As a team member, your duty is to ensure that you are doing everything practically to comply with applicable laws. You are expected to satisfy this duty by performing your responsibilities in accordance with professional standards, the regulations guiding our business practices, and our policies and procedures.

Your Compliance Officer

Therese Provencher, Enterprise Compliance & Risk Management Director

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