

MISSION

Our Mission is to do all the good we can by providing exceptional lifestyle opportunities to those we serve.

VISION

As a nationally recognized leader in senior lifestyle opportunities, Asbury continually redefines the expectations of aging.



Asbury is an Equal Opportunity Employer.

Code of Ethics & Business Conduct

Asbury Communities, Inc.
& affiliated entities



Asbury's Core Values

Commitment to residents, associates, volunteers and partners

- We value those we serve for who they are, what they have accomplished, and what they have yet to contribute.
- We are committed to providing an excellent work environment that helps associates grow both personally and in their careers.
- We appreciate the contribution of Asbury's volunteers and partners in our journey to help those we serve to Anticipate More.

Stewardship and financial strength

- We serve our constituencies by fulfilling our not-for-profit obligations, while at the same time maintaining adequate resources to keep our commitment to residents and our future endeavors.

Quality and innovation

- We will deliver excellence in service and performance, while we seek creative solutions to ensure each succeeding generation of older adults achieves a better and more meaningful life.

Integrity

- We are uncompromising in our honesty and commitments.

LETTER FROM THE CEO



Dear Associate,

It is our mission to enable personal fulfillment and dignity through the entire span of life.

To support this mission, we established ethics principles and standards of conduct, which are identified in this booklet. This commitment forms the foundation for delivering our services with care and compassion, and act within legal and ethical guidelines.

The purpose of this booklet is to provide everyone with an understanding of his or her basic responsibilities. Our supporting policies and procedures cover many of the standards in greater detail.

It is part of everyone's job to make sure we adhere to our ethical principles and standards of conduct. You are encouraged to ask questions and raise concerns. We support open communication through our non-retaliation policy and communication channels, including the Employee Hotline. Asking questions, resolving or reporting problems is a responsibility of every associate.

Our overarching objective is that we all do our personal best to make the Asbury experience exceptional.

Doug Leidig, CEO

TABLE OF CONTENTS

ETHICAL PRINCIPLES	1
Statement of Purpose	1
I. Caring	2
II. Civility	2
III. Fairness	3
IV. Integrity	3
V. Responsibility	4
VI. Respect	4
STANDARDS OF CONDUCT	5
Quality of Care & Service	5
Privacy & Security of Health Information	6
Health & Safety	7
Financial Practices	8
Conflicts of Interest	9
Kickbacks	9
Gifts & Business Courtesies	10
Protection of Assets	11
Associates	12
Communication	13
Fundraising	14
HOTLINE	15

ETHICAL PRINCIPLES

Statement of Purpose

Asbury is a not-for-profit, faith-based organization named after the first bishop of the Methodist Episcopal Church, Francis Asbury. Our ethics spring forth from that Methodist heritage. Methodists believe that a faith-based life is blessed by grace and carried outward into the world in service for others which is encapsulated in John Wesley's Code of Conduct. Methodists also believe that a life of faith has a goal of working toward perfection. Today, we translate those values by working toward excellence and doing all the good we can for seniors.

The Ethical Principles set forth in the following pages provide an additional foundation to guide our behaviors and actions as individuals and as an organization. Being a highly ethical organization fosters trustworthiness in all our relationships.

We constantly strive to maintain a focus on our guiding principles and work to enhance the reputation of the Asbury organization as a great place to live, work, and do business. We believe simply meeting the basic expectations is not sufficient. We expand our efforts by seeking to understand fundamental expectations and strive to exceed them.

The Ethical Principles are demonstrated throughout the Asbury organization in all interactions. These Ethical Principles and defining behaviors exemplify our efforts to consistently provide positive and memorable experiences.

I. Caring

We express concern for others through kindness and compassion.

- Listen carefully; understand the interests of others.
- Be sensitive to language and actions that may offend others.
- Be alert to the well-being of others; provide needed assistance.
- Respond with kindness and sensitivity to emotional distress.
- Extend ourselves to welcome and become acquainted with others.
- Help others recognize the value and potential for growth in self and others.

II. Civility

We recognize that positive human interaction builds trusting relationships and supports a healthy environment.

- Remain open to suggestions and ideas from others; look for common interests.
- Use appropriate channels to register complaints and resolve grievances.
- Take action to resolve conflict before issues grow larger.
- Manage defensive behavior by being more thoughtful in responses.
- Avoid gossip and spreading harmful information.
- Forgive ourselves and others and restrain from holding grudges or retaliating.

III. Fairness

We are committed to equitable treatment and providing all stakeholders with an environment that fosters the opportunity for individual success.

- Consider all relevant issues and facts before making decisions.
- Promote an atmosphere that fosters open communication and free of retaliatory behavior.
- Demonstrate consistent, respectful treatment of all individuals at all times.
- Engage in constructive dialogue with colleagues and draw conclusions based on multiple perspectives.
- Encourage the discussion of mistakes as an important part of the quality improvement process.

IV. Integrity

We believe a reputation of strong ethical standards is based on truthfulness and following through on commitments.

- Act in accordance with Asbury's guiding principles.
- Refuse to distort information, even when the truth may be difficult or painful.
- Ensure the accuracy and transparency of public reporting documents.
- Provide stakeholders with the rationale and intent of changes.

V. Responsibility

We hold ourselves accountable for our actions.

- Do the right thing, despite the consequences.
- Provide and seek constructive, ongoing feedback.
- Respond to inquiries, concerns, and issues with appropriate follow-up.
- Acknowledge the problem and focus on its timely resolution, rather than placing blame.
- Efficiently manage time and resources.
- Remain open to improvement and give our personal best.
- Commit to life-long learning.
- Share promising approaches for advancing services for seniors.

VI. Respect

We treat each other with dignity and consideration.

- Offer recognition for positive contributions.
- Receive compliments graciously.
- Provide sensitive feedback in private and in a manner that is specific, timely, and provides a basis for improvement.
- Value and incorporate diverse perspectives, experiences, and beliefs.

STANDARDS OF CONDUCT



QUALITY CARE & SERVICES

We are committed to providing quality care and delivering services that are responsible, appropriate and cost-effective.

- All residents are treated with dignity, respect and consideration. Any type of physical or mental abuse, including verbal mistreatment, involuntary seclusion, neglect, or intimidation is prohibited.
- We provide care and services to all residents without regard to sex, race, religion, national origin, disability, or source of payment for care.
- All care provided is reasonable and necessary for diagnosing or treating the residents' condition.
- We respect residents' and their representatives' right to know the identity and qualifications of personnel who provide services for them.
- We respect residents' and their representatives' right to receive information regarding our policies and procedures.
- We are responsive to questions from residents and their representatives.
- We respect the right of residents and their representatives to participate in decisions regarding residents' care and treatment, including the refusal of treatment to the extent permitted by law, and to be informed of the consequences of such action.

PRIVACY & SECURITY OF HEALTH INFORMATION



We are committed to maintaining the privacy and security of residents' and associates' health information.

- We take reasonable precautions to protect the privacy of individuals' health information including electronic, oral and written forms of communication.
- We are committed to accessing or providing only the minimum amount of health information necessary to do our jobs.
- We maintain complete and accurate treatment and medical records.
- We maintain written health information in secure locations away from public view.
- We take reasonable steps to ensure that individuals accessing health information have the proper authorization to do so.
- We are committed to having our business partners protect the privacy and security of health information.
- We will not discuss private health information in areas, or in a manner, that may cause it to be overheard by others not authorized to hear such information.



HEALTH & SAFETY

We are committed to providing an environment that is safe and promotes the well-being of all residents, associates and visitors.

- We use best efforts to comply with all work and safety rules, regulations and policies.
- We take reasonable precautions, including asking questions and requesting assistance, for the safety of residents, associates, and visitors.
- We maintain and regularly communicate our emergency plans and procedures to associates and residents to maximize safety.
- We practice safety awareness by thinking defensively, anticipating potential hazards, and reporting unsafe conditions in a timely manner.
- We strive to maintain an environment that is free from workplace violence. We do not engage in verbal or physical confrontation.
- The use of illegal or unauthorized drugs or alcohol is prohibited.



FINANCIAL PRACTICES

We are committed to maintaining accuracy and integrity in all our financial practices.

- We prohibit the submission of any claim for payment or reimbursement to any third party that is knowingly false, fraudulent, or fictitious.
- We only submit claims for payment or reimbursement that are actually rendered, documented in residents' treatment and/or medical records, and use billing codes that accurately describe the services provided.
- All services provided will be reasonable, necessary and, when required, directed by an appropriate health care provider and signed plan of care.
- Compensation for billing department personnel and billing consultants/advisors shall not contain any financial incentive to submit improper claims, or be in any way related to the number of claims submitted or the dollar value of the funds received.
- We do not waive co-payments or deductibles, except in accordance with applicable regulation and with the approval of management.
- We adhere to Generally Accepted Accounting Practices (GAAP) to ensure the integrity of accounting practices.
- We store all records in a secure location for a period of time required by law.



CONFLICTS OF INTEREST

We are committed to taking all reasonable steps to avoid conflicts between private interests and the official responsibilities and performance of our duties.

- We avoid situations that may create a conflict of interest. Consult management for guidance on handling any potential situation that may create a conflict of interest.
- We act in a manner that does not conflict with the best interests of Asbury Communities and its affiliates. We will never use our position or confidential information for our own personal gain.
- No immediate family member will be hired into a department where they supervise or are supervised by another family member.
- Board members and certain management personnel (“covered persons”) are in a special fiduciary position and must act with the highest degree of loyalty and integrity as representatives of Asbury and its affiliates. Covered persons must fill out annual Conflict of Interest Disclosure Statements.
- We do not make any contributions of the organizations’ funds, property or services to any political party or candidate.

Kickbacks

- Kickbacks, bribes, rebates or any kind of benefits intended to induce referrals are strictly prohibited.

- We do not solicit or receive, or offer to give, or give anything of value to any actual or potential referral source for the referral of residents, or recommendation of services, equipment, or supplies.
- We do not take into account the support or non-support of our related charitable foundations when awarding or renewing contracts or when purchasing items or services.
- We compensate health care providers at fair market value for their services. Every payment must be supported by proper documentation showing that the services were provided.

Gifts and Business Courtesies

- Associates are not permitted to solicit or accept gifts, tips or gratuities from residents.
- Associates may accept non-cash gifts with a total value of \$250 or less in any one year from any vendor, contractor, or other business associate. Gifts include anything of value except business courtesies.
- Associates may accept business courtesies, such as invitations to social events, training, educational, entertainment or informational opportunities if the cost does not exceed \$250 per person. Business courtesies include meals, transportation, conferences, etc. during which the donor and donee are both present and the business courtesy is part of the business meeting or facilitates business discussion.



PROTECTION OF ASSETS

We are committed to protecting the organizations' assets, and the assets of others entrusted to us against loss, theft, or misuse.

- We are responsible for the proper expenditure of the organizations' funds and the proper use of the organizations' property.
- We obtain all necessary approval prior to the commitment or expenditure of the organizations' funds.
- We have a duty to preserve the organizations' assets, property, facilities, equipment, and supplies.
- We have a duty to use reasonable procedures to safeguard the property of residents, associates and visitors.
- We dispose of surplus, obsolete or condemned property in accordance with policies and procedures. Unauthorized disposal of property is a misuse of assets.



ASSOCIATES

We are committed to protecting and supporting all associates as well as helping them to achieve their potential in a fair and equitable manner, regardless of gender, age, race, religion, national origin, or disability.

- We are committed to affording all associates equal employment and advancement opportunities.
- We are committed to providing all associates equal pay for equal work.
- We do not tolerate any form of physical, verbal, psychological or sexual abuse or harassment. Sexual harassment includes unsolicited or unwelcome sexual advances, requests or demands for sexual favors.
- Any verbal, physical or visual conduct that creates a hostile work environment is prohibited.
- We conform to the standards of our professions and exercise reasonable judgment and objectivity in the performance of our duties.
- We strive to understand the duties, responsibilities and challenges that face our fellow associates.
- We take reasonable steps to protect the privacy and security of associates' personal information.



COMMUNICATION

We are committed to open communication among our associates at all levels. All associates should feel free to recommend improvements, and report problems that they may experience on the job.

- We are truthful in all forms of communication, and do not disseminate any information, including marketing material, that is intentionally false, misleading or deceptive.
- We are responsible for sharing ideas and resolving or reporting problems or concerns that we find in the workplace.
- We inform residents, their family members or legal guardians about the residents' care and treatment. Informed consent includes full disclosure of potential risks, side effects, and the benefits of the proposed treatment as well as treatment alternatives.

Non Retaliation Policy

Asbury and its affiliates will not take any disciplinary action or other types of retaliation against an associate who, in good faith, reports a concern, issue, or problem to their manager or supervisor, Human Resources' representative, Compliance Officer, General Counsel, or the Hotline. "Good faith" means that you are telling the truth, as you know it. Any associate who believes that he or she has suffered retaliation should report this to the Hotline or any of the individuals noted above.

FUNDRAISING



Fundraising organizations associated with Asbury Communities and its affiliates strive to maintain and promote high standards in their solicitation of charitable contributions.

- We do not conduct misleading fundraising campaigns, utilize high-pressure techniques, nor pay for, or make use of, insincere endorsements.
- Funds are used for bone fide charitable purposes.
- We do not pay commissions, percentages, or finders' fees to anyone, including staff, for the acquisition of new sponsors or contributors.
- Names and addresses of our donors will neither be sold to, nor exchanged with, any other agency or commercial enterprise without the express consent of the donor.
- All donor records will be held in the strictest confidence unless consent for the release is given by the donor.
- We are committed to keeping fund raising and administrative expenses at reasonably acceptable levels.
- Solicitations for all fundraising events are broad-based throughout the entire community and not targeted at existing or potential vendors or contractors.



HOTLINE (1-877-455-7827)

Asbury and its affiliates understand that there may be times when concerns cannot be properly addressed through the normal chain-of-command. When such situations arise, associates are encouraged to contact the toll-free Hotline at 1-877-455-7827. Just a few things to remember about the Hotline:

- Hotline calls are taken by live operators; calls are not recorded or traced. Written reports are sent to the Compliance Officer for follow-up.
- Any type of problem can be reported to the Hotline.
- No one will be punished or disciplined for using the Hotline in good faith.
- You are encouraged to first try and resolve or report problems through the normal avenues of communication, including your supervisor or human resources
- You may remain anonymous when you contact the Hotline, but you should try to give enough detail so that your issue can be properly addressed.
- Confidentiality of callers to the Hotline who provide their identity will be protected to the extent allowed by law.
- Intentional misuse of the Hotline, such as making false accusations, is a serious violation of policy and may lead to disciplinary action.
- Do not use the Hotline for reporting emergencies.