



# CODE OF ETHICS AND BUSINESS CONDUCT

**Asbury Communities, Inc.**  
A System of Not-For-Profit  
Senior Living and Health  
Service Providers



Updated March 2022

## Mission Statement

Exploring possibilities to live your best life.

## Guiding Principle Statement

Doing all the good we can with integrity, transparency, and grace.

## Envisioned Future

By 2029, Asbury has redefined well-being, growing into one of the most innovative and technology-centric organizations.

## Vivid Description

By 2029, Asbury has changed lives for the better every day. It is a place where anticipate more is a promise. Well-being is a driver and outcome of all that we do. Through the intersection of impassioned people, a shared Mission, and cutting-edge innovation, people feel inspired and supported. Technology enables associates to think big and accomplish more. Those we serve are energized through meaningful, personal experiences. Collaborations with world-class organizations foster programs and services that outstrip our competition. Whether it is through technology or its people, Asbury can confidently call itself a leader in its field and beyond.

# DEAR ASSOCIATES,



Our heritage originates with John Wesley, an 18<sup>th</sup> century evangelist whose unique theology is deeply grounded in a missionary serving attitude toward humanity. A call to do all the good we can for those connected to us and Asbury. John Wesley's Code remains the ethical bedrock of our organization, reflected in our Guiding Principle Statement—Doing all the good we can with integrity, transparency, and grace.

Integrity means that we do the right thing, not just when it is convenient or when other people are looking. Transparency demands honesty at all times. Grace requires us to seek the good of others—at all times being respectful and inclusive toward our co-workers and those we serve.

The purpose of the Code of Ethics and Business Conduct is to provide you with an understanding of our key Foundational Pillars and important components of our Compliance Program—including a commitment to adhere to all applicable laws, regulations, and professional standards that govern our workplace. You are also encouraged to ask questions and raise concerns. We support open communication through our non-retaliation policy and varied communication channels, including the Compliance Hotline.

Through our Mission we are called to explore the possibilities to live our best lives and support others to do the same. This starts with ethical behavior and a commitment to do what is right and good at all times.

A handwritten signature in black ink, appearing to read 'Doug Leidig'.

Doug Leidig

*President & CEO | Asbury Communities*

# KEY ETHICAL & BUSINESS CONDUCT COMMITMENTS

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## **Maintain quality care and service**

Helping others live their best life begins with a commitment to provide high quality care and service at all times.

## **Protect privacy and security**

We are entrusted with health and personal information that must be maintained securely and only used according to all applicable laws and regulations.

## **Comply with laws, regulations, and professional standards**

We work in a highly regulated health care sector. Everyone must be aware of our legal and ethical responsibilities, and strive each day to meet those standards.

## **Ensure accuracy in all financial practices**

We commit to maintain the accuracy and integrity in all our financial practices, including the coding, billing, and reimbursement for all products and services. The submission of false or fraudulent claims is strictly prohibited.

## **Avoid conflicts of interest**

Our commitment to integrity demands that we avoid situations in which we receive (or may receive) an inappropriate or unlawful personal benefit from our decisions or actions made in the context of our job and workplace.



## **Lead with grace**

We must take steps to make everyone feel included and respected. We should understand the differences in human error, reckless behavior, and intentional misconduct—and respond appropriately to these different situations.

## **Facilitate open and truthful communication**

In a complex health service and business environment, we understand that things may go wrong. Therefore, we are responsible for fostering an environment of transparency that supports

open, honest and truthful communication. We are required to report any issues or concerns that come to our attention.

## **Prohibit retaliation**

Any type of retaliation against anyone who, in good faith, reports a problem or concern is strictly prohibited. You may report problems or concerns to your supervisor, Human Resources representative, or the Compliance Hotline.

## **Address identified noncompliance**

Beyond reporting, we are required to fix the problems and errors that are brought to our attention and ensure proper reporting to government agencies, when required.

# KEY COMPONENTS OF OUR COMPLIANCE PROGRAM

## Compliance Officer

The Compliance Officer is responsible for the day-to-day operation of the Compliance Program.

## Compliance Committee

Executive leadership team responsible for ensuring effectiveness of the Compliance Program.

## Hotline (1-877-455-7827)

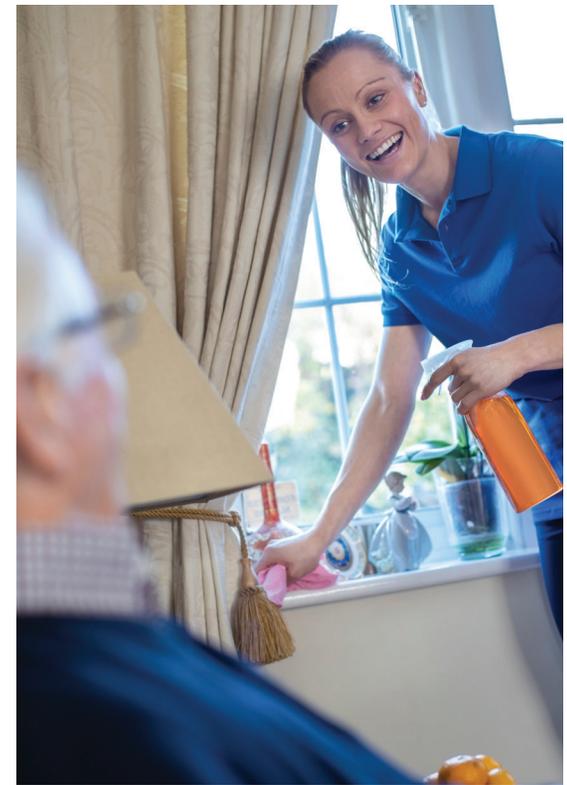
### or via the web: [asbury.ethicspoint.com](https://asbury.ethicspoint.com)

- » All Compliance Hotline calls are answered by live operators who are not Asbury employees.
- » Callers to the Hotline may remain anonymous.
- » Confidentiality of callers who identify themselves will be protected to the extent possible or allowed by law.
- » Callers will be provided a report number so they can call back to receive or provide additional information.
- » Emergencies should not be reported to the Hotline. Emergencies should be immediately reported to a supervisor, manager, director, or human resources representative.



## Whistleblower and non-retaliation

- » Associates are required to report any known workplace problems or concerns.
- » Disciplinary action or retaliation is prohibited against any associate who makes a report in good faith.
- » Good faith means that the person is telling the truth as they know it.



## Policies and Procedures

Policies and Procedures will be readily available to associates and provide clear guidance on compliance matters.

## Training and Education

All associates receive training on their role in maintaining compliance.

Please visit Asbury's Corporate Compliance & Risk Management website on Align for additional detail, including name and contact information for our Compliance Officer, and information on the False Claims Act, whistleblower protections, hotline, non-retaliation policy and more.



**ASBURY**   
Anticipate More

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