

THE HORIZON CORPORATIONS

CODE OF CONDUCT

Horizon has established the following "Code of Conduct" to guide all interactions of Board members, staff members, students, volunteers and consultants with patients, family members/significant others, referral sources, other care providers, vendors, suppliers, payers, the greater community, and one another. The overriding expectation is that all interactions are respectful and professional, and intended to be helpful and responsive.

Commitment to Patients

1. I will not use my professional relationship with patients or their families/significant others to further my own financial or personal interests, nor extend this relationship beyond appropriate professional limits.
2. I will not solicit, refer or admit current Horizon patients to clinical services I provide privately or to an organization at which I am or will be employed, without prior authorization from my supervisor. I will also not solicit Horizon patients to clinical services I provide privately or to an organization at which I am or will be employed after my employment with Horizon is ended.
3. I will not threaten, harm, coerce or intimidate, nor direct profane, abusive or disrespectful language towards patients, their significant others or other Horizon customers.
4. I understand that a personal or financial relationship with a current or former patient is prohibited or restricted and that I will immediately inform my supervisor of the existence of any such relationship.
5. If at any time I have had a pre-existing direct financial, purchase or trade of services, social or romantic/sexual relationship with a person who becomes a Horizon patient, I will immediately report this to my supervisor and recuse myself from any care delivery role or case discussion regarding that patient and will not access their protected health information.
6. I will abide by all laws, regulations, and Horizon policies regarding patient confidentiality.
7. I will not discriminate against patients for any reason and will immediately report all instances of suspected discrimination or unprofessional conduct to my supervisor.
8. I will not recommend or provide clinical services that are not medically necessary and consistent with laws, regulations, and ethical practice.

Commitment to Professionalism

1. I will utilize supervision to further my professional development and improve the quality of care I deliver.
2. I will report to my supervisor and seek assistance for any problem that impairs my professional performance.
3. I will keep my professional credentials current.
4. I will adhere to the regulations, standards and ethical guidelines promulgated by the pertinent government agencies, and by my professional association.
5. I will ensure that the clinical records or corporate documents that I am responsible for are accurate, complete and timely.
6. I will only provide clinical services consistent with supervisory direction/approval, and my training, credentials, and/or scope of practice.

Commitment to Co-Workers

1. I will respect the rights and views of my colleagues, and treat them with honesty, fairness and courtesy.
2. I will strive to resolve differences of opinion with co-workers through cooperation and respect.
3. I will not discriminate against my co-workers for any reason, and will treat all co-workers with the utmost respect.
4. I will not sexually harass any employee, nor condone such harassment.
5. I understand that I am expected to work in a cooperative manner with management/supervisors, co-workers, patients and vendors.
6. I understand that I am expected to abide by Company policies and cooperate fully in any investigation that the Company may undertake.
7. I understand that being insubordinate, threatening, intimidating, acting in a disrespectful manner or assaulting a manager/supervisor, co-worker, patient or vendor will result in discipline.

Commitment to the Corporation

1. I will not falsify any Corporate or work-related documents.
2. I will provide, document, schedule, and bill services consistent with Horizon standards/policies and applicable laws.
3. I will not knowingly bill, document, or cause to bill, insurance companies, government agencies, grant organizations or other payers for any treatment or other corporate services that were known not to be medically necessary or were not provided as described in the clinical record and billing invoice.
4. I will ensure that my documentation of services and billing, including statements, data, and other information are true, accurate and complete, and that no material facts are omitted.
5. I understand that payment for Medicaid and Medicare services will be from federal, state, and local public funds, and that I may be prosecuted under applicable federal and state laws for any false claims, statements, or concealments of a material fact.
6. I will immediately report any possible or known violations of the above by myself or by others to my supervisor and to any senior staff member, the Chief Compliance Officer, or the chairperson of the Board Audit Committee.
7. I will not leave my assigned place of work during scheduled hours without permission and without supervisory authorization, nor fail to report or return to work on time.
8. I will not sleep during my work time.
9. I will only use medications as prescribed and will not report to work if my ability to perform my job is impaired.
10. I will not use alcohol or other non-prescribed or illegal substances during the workday (including my lunch period), nor arrive at work under the influence of these substances.
11. I will not bring tobacco or marijuana products or associated materials onto Horizon property, nor come to work, or return from lunch or breaks, with the odor of tobacco or marijuana on my person.
12. I will not be careless or negligent of corporate materials, nor cause loss or damage to corporate property.
13. I will not share my computer password(s) with others, nor use corporate electronic communication equipment or other materials in violation of corporate policy.
14. I will not commit theft of corporate or other persons' property.

15. I will not act in a rude or unprofessional manner toward a patient or anyone in contact with the Corporation.
16. I will not bring alcohol, non-prescribed or illegal substances, firearms, weapons, explosives or other potentially harmful materials on corporate premises.
17. I will not post or remove notices, signs, or any other forms of writing on bulletin boards or on corporate property without proper authorization, and will not deface such materials.
18. I will adhere to all safety rules and procedures, and not create or contribute to unsanitary or unsafe conditions.
19. I will immediately report injuries and on-the-job accidents to my supervisor.
20. I will not sell or distribute any non-work related literature or products during work time or in work areas without authorization.
21. I will not solicit for any reason during work time except as authorized and/or for corporate-related benefit.
22. I will not lobby for political candidates nor promote my personal political or spiritual/religious beliefs on corporate time or property.
23. I will not present myself as a representative of the Corporation, nor make public statements on behalf of the Corporation except as authorized.
24. I will make no contributions to political causes or parties using corporate funds or as a representative of the corporation.
25. I will not participate in the development of any agreement or contract on behalf of the corporation with a vendor, supplier, consultant, referral source or others with whom I have a personal or financial interest, without disclosing this interest to, at minimum, my supervisor and the Chief Compliance Officer.

Acceptance of Gifts

1. I will not solicit gifts from patients, their family members/significant others, vendors, consultants, suppliers, referral sources or other providers except for corporate-approved purposes.
2. I will not accept personal gifts from these sources that are of more than nominal value.
3. I will not accept any gifts offered with the apparent intent to influence clinical decision-making, reporting or other actions of the Corporation.
4. I will use good judgment and discretion in accepting gifts and will share gifts received with other employees to the extent possible.
5. I understand that my attendance of vendor funded activities (meals, entertainment) requires that they have a corporate-related purpose.
6. I will not offer gifts with the intent of influencing the decision-making or actions of any purchaser, supplier, client, or government official towards the Corporation.

Confidentiality/Privacy

State and Federal law, and other regulations protect the confidentiality of all paper and electronic information regarding Horizon clients, including their identity. There are civil and criminal penalties for the violation of laws and regulations regarding confidentiality. Horizon's policies and procedures regarding the release of this protected health information are addressed in Horizon's Privacy Policy within the Program Policy and Procedure Manual Section 181. This section is also on the corporate Intranet in the "Policy and Procedure" section. I acknowledge that I must continue to abide by the rules of client confidentiality after my employment with Horizon has ended and agree

that if I am contacted by anyone regarding confidential client information at such time, I will not release any information and will notify a member of Senior Staff as soon as possible.

Proprietary Information

I acknowledge that, I will/ have acquired or learned of Horizon's proprietary information.

Proprietary information includes Horizon:

- Policies and Procedures,
 - Training materials,
 - Template documents/forms,
 - Rules and standards regarding Horizon's services/programs,
 - Clinical Program guidelines,
 - Employee Services forms,
 - Billing procedures,
 - Information Technology systems and software
 - Financial records, and
 - Any documents or materials I create in the course of my employment.
- I understand that such information is Horizon's intellectual property and that I may not copy, download, use, or share such information at any time without prior authorization.
- I understand I am prohibited from sending copies of any proprietary information to my personal email account or copy and send outside of Horizon without prior authorization.
- I also understand that my Horizon internet use, emails, telephone calls and voicemail are Horizon property, and may be recorded and stored.

Whistleblower Policy/ Reporting Possible Corporate Compliance Policy Violations

Horizon encourages staff to seek information regarding, and/or report all possible Corporate Compliance Policy violations to ensure our adherence with all applicable laws and regulations. Please see our Whistleblower Policy in our Compliance Policies for complete details.

Affirmation

I understand that:

- Violation of these requirements may lead to disciplinary action, including suspension or termination;
- Violation of these requirements may be against Federal and New York State Law and lead to arrest and prosecution, or reporting to professional credentialing or licensing bodies, as well as the NYS Justice Center and other regulatory agencies as potential patient abuse;
- I should refer to Horizon's Policies and Procedures Manuals for further details regarding these matters, and seek supervision regarding any related matters regarding which I am unclear;
- I am responsible to make a report if I believe that I or another staff member have violated this Code of Conduct or other ethical or legal standards;
- All reports will be investigated fully, my confidentiality will be protected as possible, and that
- Horizon will not take any retaliatory action against me for filing a good faith report of a potential violation, and that I may bring action regarding any perceived retaliation according to the conditions described in Horizon's Whistleblower Policy.