



Ability &
Independence.
Redefined.

Code of Conduct

Integrity and Compliance Program



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Our Mission

Inglis enables people with disabilities – and those who care for them – to achieve their goals and live life to the fullest.

Dear Team Members,

Since I joined Inglis in August 2017, I have been amazed and awed by the dedication, care and commitment our staff – at all levels – give every day to our residents and consumers. Each of us is a vital link in ensuring the integrity of Inglis. Inglis' commitment to excellence is the foundation of our organization and the strength that makes it successful.

Inglis has a set of guiding core principles and values we use to do our work each day. This booklet is the formal statement of those principles in the form of standards and rules for ethical conduct in the workplace - in how we interact with our residents, consumers, colleagues, vendors and board. These principles and values are the same for each of us at Inglis, regardless of the job we do.

Our Code of Conduct is an integral part of Inglis' commitment to an ethical work environment. It highlights our standards of proper legal, ethical and professional behavior and describes how team members can communicate any legal, ethical or quality concerns so they can be swiftly resolved.

This Code of Conduct is not meant to cover every possible situation. You are expected to use your own good judgment and abide by the standards of your profession as well.

If you have any questions about this Code of Conduct and the Inglis Corporate Ethics and Compliance Plan, you are encouraged to talk to your supervisor.

We all have a duty to fulfill our ethical, legal and professional responsibilities. Thank you for doing your part by following Inglis' Code of Conduct as you help to fulfill Inglis' mission enabling people with disabilities – and those who care for them – to achieve their goals and live life to the fullest.

Sincerely,

A handwritten signature in blue ink that reads 'Dyann M. Roth'.

Dyann M. Roth
President & CEO

An Overview Integrity and Compliance Program

Inglis created the Integrity and Compliance Program to reinforce Inglis' commitment to providing care and conducting business with honesty and fairness. When people behave with integrity, they act honestly, sincerely, ethically, morally, and legally. The Inglis Code of Conduct and Standards of Excellence are formal statements of Inglis' standards of ethical conduct.

The Code of Conduct and Standards of Excellence apply to team members at every level of the organization. References to "team members" mean employees, officers and Board members, independent contractors, subcontractors, and vendors who may provide services or are involved with healthcare or billing. Throughout this handbook, we have tried to use language and references that apply to each of Inglis' lines of business. The term "consumer" refers to individuals who receive the various types of care, housing, services, and products Inglis provides.

Introduction to Inglis' Code of Conduct

The Code of Conduct is a formal statement of Inglis standards and rules for ethical conduct.

As Inglis team members, we share a commitment to legal, ethical and professional conduct in everything we do. We support these commitments each day in our work. The success of Inglis as a provider of healthcare, housing, services, and products depends on us – our personal and professional integrity, our responsibility to act in good faith and our obligation to do the right things for the right reasons.

Inglis must comply with all federal, state and local laws and regulations that apply to the healthcare and other services and products that Inglis provides, as well as all laws that apply to Inglis business dealings. Violations of these laws and regulations can result in severe penalties, for Inglis and team members, including financial penalties, exclusion from participation in government programs and in some cases, imprisonment.

Inglis Standards of Excellence

The Standards of Excellence are based on Inglis' LIST ONE core values, and serve as a guide for performance and behavior expected of Inglis employees. Demonstrating the Standards of Excellence in our daily work strengthens and reinforces our dedication to Inglis' mission and values. Our continued commitment to these Standards will ensure the provision of excellent care for our community and a positive work environment for our employees.

These Standards were developed by a diverse team of Inglis employees and are modeled by our team members every day. The Standards of Excellence are not designed nor intended to replace Inglis' policies and procedures, the Compliance Code of Conduct or laws and regulations.

Talk with your immediate supervisor, manager or Human Resources staff if you need clarification or have questions about the Standards of Excellence.

Our primary commitment is to provide the care, services, technologies and living environments necessary to help each consumer and employee to achieve meaningful purpose, worthwhile work, a chance to make a difference, and an opportunity to love and be loved.

LIST ONE Values

Learn

Integrity

Service

Teamwork

On-time,
On-budget, On-target

No excuses,
No blame

Excellence

Learn

We seek to gain knowledge and wisdom from life's experiences. Every success, every action and every failure provides an opportunity for learning and continuous improvement.

STANDARDS OF EXCELLENCE

- Recognize and encourage new ideas and creativity.
- Use new ideas to meet the ever-changing needs of consumers and staff.
- Continually review and update processes to achieve success.
- Share and celebrate personal, departmental and organizational successes.
- Pursue personal learning and development.

Integrity

We think, act and behave consistent with our commitment to the Inglis mission and our values. We share our thoughts and opinions openly with honesty, courage, truth and compassion. We make commitments wisely and act upon those commitments fully.

STANDARDS OF EXCELLENCE

- Lead by example and model what we expect of others.
- Give tactful feedback when behavior or practices are not up to standard.
- Respect and adapt to your surroundings and respond appropriately.
- Build trust by keeping your word and following through.
- Listen compassionately to all issues and concerns without passing judgment.
- Promote a safe environment; focus on the task at hand.
- Protect and respect the privacy and confidentiality of all.
- Know and follow Inglis' policies, procedures and guidelines.

Service

We seek to serve our clients, colleagues and community as we would want to be served. We put others' needs and interests ahead of our own and seek to find win-win solutions to problems and issues.

STANDARDS OF EXCELLENCE

- Listen carefully to the needs of others, responding with patience, tolerance and respect.
- Be kind and helpful, make everyone feel welcomed and comfortable.
- Make eye contact, smile, say hello, introduce ourselves, call people by name and say a few kind words, all with a positive attitude.
- Handle with care; imagining we are on the receiving end of the experience.
- Be aware of how actions and language impact others.
- Explain reasons for changes as they occur.
- Promote and maximize independence.
- Take pride in our appearance, as well as the appearance of our facility. Do not damage or misuse consumer, staff, or Inglis property.

Teamwork

We are a team, working together to make Inglis the finest organization serving people with physical disabilities in the world. We know that teamwork is essential to achieving that goal and work to build relationships with others based upon both trust and trustworthiness.

STANDARDS OF EXCELLENCE

- Support the Inglis mission.
- Value diversity and accept each others' differences.

- Support each other and bring our best to the team.
- Welcome new members to the team.
- Help wherever and whenever we can.
- Respect each other; avoid spreading rumors or gossip.
- Celebrate and share successes with the team.
- Create and maintain an environment that supports personal and team safety.

On-time, On-budget, On-target

No surprises!

STANDARDS OF EXCELLENCE

- Share and use our resources wisely.
- Keep your word and follow through.
- Arrive for work on time and ready to work each day.
- Plan absences in advance when possible; coordinate time off with supervisor and other team members to ensure sufficient staff coverage.

No excuses, No blame

Just individual and shared accountability.

STANDARDS OF EXCELLENCE

- Be responsible for our actions, comments and attitudes towards consumers, families and all members of our team.
- Do what needs to be done willingly, effectively, correctly and in a timely manner.
- Support each other in finding solutions rather than blaming others or making excuses.

Excellence

We seek to set the standard for excellence in everything we do.

STANDARDS OF EXCELLENCE

- Uphold the LIST ONE values at all times.
- Seek to create meaningful purpose, worthwhile work and a chance to make a difference for every life we touch.
- Achieve great results for our consumers, our colleagues and our organization.
- We continually seek opportunities to innovate and improve to enhance consumer's experiences and achieve our goals.
- Set the bar high toward achieving our goals - measuring outcomes; seeking best practices and improving our work to do better every day.
- Become a recognized innovator in serving people with physical disabilities, a national catalyst of best practices and a high performing, financially sustainable organization.

*Integrity at Inglis... every day,
in every way*



Ethics

Because we are in the business of caring for and providing services to others, it is critical that each of behaves ethically. As individuals and as an organization, we are responsible to many different groups. We must act ethically and responsibly in our relations with:

- Consumers and their families
- Colleagues and coworkers
- Volunteers
- Physicians and Independent Licensed Practitioners
- Healthcare payors, including federal and state governments
- Regulators, surveyors and monitoring agencies
- Business associates, vendors and suppliers
- Students, Colleges and Universities
- Communities we serve

Any compromise in our standards could harm our consumers, our coworkers and our organization. Like every organization that provides care, housing, services and products, we do business under very strict regulations and close oversight. Fraud and abuse are serious issues. Sometimes even an innocent mistake can have significant consequences that could result in substantial penalties to you and to Inglis.

You are required to complete annual training on Inglis' Integrity and Compliance Program as well as the Code of Conduct as a condition of employment at Inglis, and you must follow the Code to remain employed. There is no justification for departing from the Code of Conduct, no matter what the situation may be. You are responsible for ensuring that you comply with the Code and all Inglis policies and procedures.

Reporting Concerns, Violations, and Critical Events

As a team member, you must help ensure that Inglis is doing everything practical to comply with applicable laws, rules, and regulations. This means that you have a duty to report any concerns, violations, or critical events you observe or perceive, regardless of your role at Inglis.

If you observe or suspect a situation that you believe may be unethical, illegal, unprofessional or wrong, or if you have a clinical, ethical or financial concern, you are required to report it.

The Reporting Process

1. First, talk to your supervisor. He or she is most familiar with the laws, regulations and policies that relate to your work.
2. If you are not comfortable talking with your supervisor or are not satisfied with the response you receive, talk to another member of the management team or someone from Human Resources.
3. If you still have a concern, contact the Compliance Office directly or if you prefer, call the toll-free Inglis Compliance Hotline for assistance. Concerns can also be registered directly via the Compliance Hotline link located on the Inglis intranet.
 - The Inglis Compliance Hotline is staffed by a company that specializes in providing confidential reporting services. You may call this line anonymously anytime, 24 hours-a-day, 7 days-a-week.
 - You must provide enough information to start the investigation process.
 - You can make a report in good faith to the Inglis Compliance Hotline without fear of reprisal, retaliation or punishment for your actions.
 - If you suspect a violation and do not report it, you could face disciplinary action and in some cases, you may even face legal action.
 - Inglis Compliance Hotline: **(866) 368-1902**
 - Inglis Compliance Office: **(215) 581-0731**

A Compliance Department member, or management designee, will investigate compliance concerns to detect possible violations in applicable laws, regulations, and policies. The extent of the investigation will vary depending upon the concern.

Consumers' Rights

Our most important job is providing quality care to our consumers. This means offering compassionate support to our consumers and working toward the best possible outcomes while following all applicable rules and regulations. Consumers receiving services have clearly defined rights. To honor these rights, you must:

- Make no distinction in the admission, transfer or discharge of a consumer, or in the care Inglis provides, on the basis of race, gender, age, religion, national origin, disability, color, marital status, veteran status, medical condition, genetic information, ancestry, other protected-class status, insurance or financial status.
- Ensure that housing is available to consumers without discrimination based on race, color, religion, sex, disability, familial status, or national origin.
- Treat all consumers in a manner that preserves their dignity, autonomy, self-esteem and civil rights.
- Protect every consumer from physical, emotional, verbal or sexual abuse or neglect.
- Protect all aspects of consumer privacy and confidentiality.
- Respect consumers' personal property and money and protect it from loss, theft, improper use and damage.
- Respect the right of consumers to access and use technology.
- Respect the right of consumers and their legal representatives to be informed of and participate in decisions about their care and treatment.
- Respect the right of consumers and/or their legal representatives to access their records as requested.
- Recognize that consumers have the right to consent to or refuse care and the right to be informed of the consequences of such refusal.

- Protect the consumer's right to be free from physical and chemical restraints.
- Respect the consumer's right to self-determination and autonomy.

Providing Quality Care

Our primary commitment is to provide the care, services, technologies and living environments necessary to help each consumer to achieve meaningful purpose, worthwhile work, a chance to make a difference, and an opportunity to love and be loved.

To meet the Inglis quality of care standards, we:

- Accurately assess the needs of each consumer and develop plans that meet those needs.
- Frequently review goals to ensure that our consumers' ongoing needs are being met.
- Provide only medically necessary, physician-prescribed services and products that meet the consumer's needs.
- Ensure that services and products are reasonable in terms of frequency, amount and duration.
- Provide living and work environments that are safe, accessible and responsive to individual needs.
- Measure outcomes and consumer satisfaction to confirm that goals are met.
- Focus on making improvements when outcomes and goals are not being met and/or consumers are not satisfied.
- Provide accurate and timely documentation and record-keeping.
- Ensure that consumer care is given only by approved providers with the appropriate background, experience and expertise.

Abuse and Neglect

Every Inglis consumer has the right to be free from verbal, sexual, physical, and mental abuse and neglect, misappropriation, exploitation, and involuntary seclusion. Inglis will not tolerate any type of consumer abuse, neglect, or misappropriation. Consumers must be protected not only from team members, but also from other consumers, family members, legal guardians, friends or any other person. This standard applies to all consumers at all times.



Any team member who abuses or neglects a consumer, or misuses or takes consumer property without the permission of the consumer is subject to termination. In addition, legal or criminal action may be taken. Abuse and neglect must be reported immediately to your supervisor or other member of management under the mandatory reporting requirements of the Commonwealth of Pennsylvania. In compliance with appropriate state statutes, you must also report all suspected cases of abuse, neglect, or exploitation to the appropriate protection organization(s).

Privacy and Information Security

Team members must use and disclose medical, financial, business or personal information only in a manner consistent with Inglis' privacy policies and procedures, and state and federal law. Every team member must treat all information, including any documents or records that contain consumer or employee protected health information (PHI) (such as names, social security numbers, addresses, telephone numbers, medical histories, treatment histories, financial information, and insurance information), medical records and charts, and business documents as confidential.

When accessing or using information to fulfill your job responsibilities, only use information that is required, and only use the minimum amount. Several federal and state laws and regulations give individuals rights over their health information and set rules and limits on who can look at and receive this health information. These rights apply to all forms of an individuals' protected health information (PHI), whether electronic (e-PHI), written, or oral. These laws also protect you as an employee, requiring Inglis to safeguard your PHI, like the confidential information contained in your personnel file.

Employment Practices

Hiring

Inglis is committed to fair employment practices. When hiring and evaluating team members, Inglis:

- Complies with federal, state and local Equal Employment Opportunity laws, hiring the best-qualified individuals regardless of ancestry, creed, color, religion, age, sex, sexual orientation, marital status, disability, place of origin, or genetic information. All promotions, transfers, evaluations, compensation and disciplinary actions also follow this practice.
- Conducts employment screenings to protect the integrity of our workforce and the welfare of our consumers and team members.
- Requires all team members who have professional licenses or certifications to maintain their credentials in compliance with state and federal laws.

Inglis will not employ, contract with, or bill for services ordered, rendered or supervised by anyone:

- Convicted of a violent crime, including assault, abuse or rape.
- Convicted of a criminal offense related to healthcare, including fraud, neglect or abuse of consumers.
- Convicted of a felony in the preceding seven years.
- Convicted of an offense considered exclusionary by state statute, regulation or standard.
- Excluded from or ineligible to participate in federal and state healthcare programs.
- Disbarred or excluded by a duly authorized licensing agency.
- Listed on the Federal Terrorist List maintained by the Department of Treasury, Office of Foreign Asset Control.

You must immediately report to your supervisor if you are convicted of an offense that would preclude employment at Inglis; if action has been taken against your license; or if you are excluded from participation in any federal or state healthcare-funded program. Any Inglis team member who is alleged to have committed a serious criminal act will be suspended and, if convicted of a felony, will be terminated.

Safety

Inglis is committed to maintaining a safe and healthy workplace for all of our team members. That is why Inglis has developed policies and procedures that describe our safety program. Become familiar with safety regulations, policies, and emergency plans regarding fire and disaster in your work area.

In addition to policies, you must abide by all environmental laws and regulations. You are expected to follow safety guidelines and to take personal responsibility for helping to maintain a secure work environment. If you notice a safety hazard, take action to correct it, secure the area until help arrives, or report it to a supervisor immediately.

Workplace Violence

Inglis is committed to providing every team member and consumer with a safe environment and fostering their well-being and health. You are prohibited from engaging in violent, abusive, harassing, or aggressive behavior and possessing, discharging, or otherwise using firearms, explosives or weapons while performing any job-related duties for Inglis, or at any Inglis-sponsored event, on or off Inglis premises. Inglis will report criminal violent behavior to local, state, and/ or federal law enforcement officials, file charges, and seek police assistance in any violent incident as appropriate. Any confiscated illegal weapons will be immediately turned over to law enforcement. Inglis will coordinate its violence prevention efforts with local, state, and/or federal law enforcement.

Inglis is committed to providing every team member and consumer with a safe environment and fostering their wellbeing and health.

Drug and Alcohol Abuse

While working on behalf of the organization, you must not consume any substance that impairs your ability to provide safe and effective services or otherwise perform your employment duties.

You may never use or sell alcohol and/or illegal drugs on Inglis property or report to work under the influence of alcohol and/or illegal drugs. For team members who appear to have work performance problems related to drug or alcohol use, Inglis will conduct drug and alcohol screening and take appropriate action if necessary.

Inglis prohibits illegal, improper or unauthorized use of any substance that is intended for a consumer. If you become aware of any improper diversion of drugs or medical supplies, you must immediately report the incident following the Reporting Process.

Conflict of Interest

You have a responsibility to ensure that your actions and relationships do not create a conflict of interest or cause loss or embarrassment to Inglis. A conflict of interest is a situation in which your personal interests interferes with the interests of Inglis. A conflict of interest may affect or appear to affect:

- Your business judgment.
- Delivery of consumer care or services you provide.
- Your ability to do your job effectively.

A conflict of interest can occur when you are in a position to influence a decision that may result in a personal or financial gain for you or your relative.

There are many types of conflict of interest and these guidelines cannot anticipate them all; however, here are some examples:

- Taking a job outside the company of Inglis.
- A close personal relation or a family member who works for Inglis.
- A close personal relation or a family member who works for an Inglis vendor or contractor, and is in a position to influence your decisions affecting business at Inglis.
- Financial involvement with competitors, vendors or others that would cause you to put your or their financial interests ahead of Inglis.

Inglis permits outside employment when approved by management. If you are unable to maintain Inglis' standards as a result of a second job, Inglis reserves the right to rescind permission for outside employment.

Use of Property and Assets

Inglis property and assets – everything from office supplies and computers to Inglis vehicles and the hours you work – represents a significant expense and should only be used for authorized purposes. You must protect the assets of Inglis and ensure their authorized and efficient use. Theft, carelessness and waste have a direct impact on Inglis' sustainability. We all must make sure that we exercise good judgment and care when using Inglis supplies, equipment and other property.

Computers and the Internet

You are expected to use Inglis computers, e-mail and Internet systems appropriately. You are not permitted to use the Internet for improper or unlawful activity – including visiting pornographic, gambling or other inappropriate sites – or to download unauthorized programs onto Inglis computers. Internet use is tracked, and Inglis monitors how you use your time on the Internet. Abuse of Internet access is grounds for discipline up to and including termination.

Gifts and Business Courtesies

Inglis recognizes that on occasion others may want to show you appreciation. In recognition of this, Inglis policy provides guidelines to help you understand what an acceptable gift is.

Inglis wants to ensure that gifts are an expression of healthy and respectful relationships and do not create unfair and inequitable situations.

There are clear guidelines on what can be accepted and given by you:

- No gift can be cash or a cash equivalent such as a gift card.
- Gifts cannot be given or received with the intention to influence decisions about vendor selection, care delivery, or service.
- Gifts to or from consumers or their families may not exceed a value of \$10 per individual, or \$50 to a group of individuals.
- The federal government has very clear expectations that you do not engage in giving or receiving of gifts that may be perceived as a bribe to induce the referral of a consumer or the ordering of a service or supply paid for by a governmental healthcare program.

Vendor Relationships

Building trusting relationships with vendors, contractors and others in the communities we serve is an important part of Inglis' business. We take responsibility for being a good consumer and dealing with vendors honestly and ethically. Inglis is committed to fair competition among

prospective vendors and contractors for our business. Arrangements between Inglis and its vendors must always be approved by management. Certain business arrangements must be detailed in writing and approved by management and the Compliance Office. Contractors or vendors who provide consumer care, reimbursement or other services to beneficiaries of federal and/or state healthcare programs are responsible to uphold and follow Inglis' Integrity and Compliance Program and Inglis policies and procedures, as well as applicable laws, rules, and regulations.

- Gifts cannot be given or received with the intention to influence decisions about vendor selection, care delivery, or service.
- Gifts to or from consumers or their families may not exceed a total value of \$10 per individual, or \$50 to a group of individuals.
- The federal government has very clear expectations that you do not engage in giving or receiving of gifts that may be perceived as a bribe to induce the referral of a consumer or the ordering of a service or supply paid for by a governmental healthcare program.

Communication and Social Media

Our environment is incredibly dynamic, and our communications should positively reflect our commitment to the consumers we serve. Moreover, social media has become an increasingly important communication tool, but it also presents an arena for potential communications pitfalls. Team members who publish or post content on blogs, social networking sites, or other user-generated media in the internet should exercise good judgment and follow Inglis' policy on social media use.



Compliance with Federal and State Laws

Because we are in healthcare, housing, services and products and other regulated businesses, we must follow the many federal, state and local laws that govern those industries. Keeping up with the most current rules and regulations is a big job – and an important one. You are responsible for learning and staying current with the federal, state and local laws, rules and regulations, as well as the policies and procedures that apply to your job. Managers must review regulations and policies with team members to make sure they understand and comply with them.

Billing, Business Practices, and False Claims

Inglis is committed to operating with honesty and integrity. Therefore, you must ensure that all statements, submissions and other communications with consumers, prospective consumers, the government, suppliers and other third parties are truthful, accurate and complete.

Inglis will not tolerate any deliberately false or inaccurate billing. Any team member who knowingly submits a false claim, or provides information that may contribute to submitting a false claim such as falsified clinical documentation, to any payor – public or private – is subject to termination. In addition, legal or criminal action may be taken.

Prohibited practices include but are not limited to:

- Billing for services or items that were not provided or costs that were not incurred.
- Duplicate billing – that is, billing for the same item or service more than once.
- Billing for items or services that are not medically necessary.
- Assigning an inaccurate code or consumer status to increase reimbursement.
- Providing false or misleading information about a consumer's condition or eligibility.
- Failing to identify and refund credit balances.

- Submitting bills without supporting documentation.
- Soliciting, offering, receiving, or paying a kickback, bribe, rebate or any other remuneration in exchange for referrals.

If you observe or suspect that false claims are being submitted or have knowledge of a prohibited practice, you must immediately report the situation following the Reporting Process. The Pennsylvania Whistleblower Law makes it unlawful for Inglis to terminate, threaten, discriminate or otherwise retaliate against an employee for making a good faith report to Inglis or appropriate oversight body of wrongdoing or for participating in an investigation of any suspected wrongdoing. A whistleblower who believes that he or she has been retaliated against can file a lawsuit under the Pennsylvania Whistleblower Law.

Gifts to Public Officials

As a general rule, federal laws and the laws of most states prohibit giving anything of value to government officials with the intent to influence the decisions of government. In accordance with these laws, Inglis' policy is that nothing of value may be given to federal or state officials. Likewise, there are federal and state laws that define the circumstances in which an organization can contribute to political campaigns. Inglis' policy is that the organization will not contribute anything of value to the political campaign of any person running for office unless specifically permitted by law and authorized by the Chair of the appropriate Inglis Board, or the President & CEO.

From time to time, Inglis may invite team members and consumers to make personal contact with government officials or to write letters voluntarily expressing their concerns or their position on a particular issue. In addition, some team members regularly have contact with government officials. In these situations, team members must comply with all applicable laws and regulations. However, team members must not solicit or engage in individual election-related activities in the workplace. If a team member has any questions about contacting a government official, he or she should contact the Chief Integrity Officer.



Charitable Contributions

Inglis may contribute to charitable organizations provided that Inglis' contribution is not, and cannot be seen as, an attempt to induce referrals. Team members may not solicit each other for charitable contributions, except for Inglis-sponsored events. Written approval from the President & CEO must be obtained before making a charitable contribution to another organization in Inglis' name.

Kickbacks and Referrals

Inglis team members often have close associations with local healthcare providers and other referral sources. To demonstrate ethical business practices, you must make sure that all relationships with these professionals are open, honest and legal. You must never solicit, accept, offer or give kickbacks of any kind.

The Anti-Kickback law makes it a crime to knowingly and willfully offer, pay, solicit, or receive something of value to induce or reward referrals under federal health care programs. A kickback is an item or service of value including cash, goods, supplies, gifts, "freebies" or bribes received in exchange for a consumer referral. In accordance with this statute, Inglis only accepts consumer referrals based solely on needs and our ability to provide the services required by the consumer. Additionally, Inglis only makes referrals based solely on consumer needs and the recipient's ability to provide the needed services.

Investigations

Inglis is committed to cooperating with all governmental inquiries, audits or investigations. You must contact the Compliance Office immediately if government investigators contact you at work or at home for work-related issues. The Compliance Office can verify the investigator's credentials, determine whether the contact is legitimate and help you follow the proper procedures for cooperating with the investigation. Inglis has specific policies and procedures that provide more detailed information on how to respond in these situations.

In complying fully with Inglis' policies, you must not:

- Lie or make false or misleading statements to any government investigator or inspector.
- Destroy or alter any records or documents in anticipation of a request from the government or court.
- Attempt to persuade another team member or any person to give false or misleading information to a government investigator or inspector.
- Be uncooperative with a government investigation.

If you receive a subpoena or other written request for information from the government or a court, contact the Compliance Office before responding.

Voluntary Disclosure

It is the policy of Inglis to voluntarily report fraudulent conduct it uncovers that affects any federal or state healthcare or housing program.

Performance Management

If you fail to act in accordance with the Integrity and Compliance Program, the Code of Conduct, Standards of Excellence, policies and procedures and applicable federal and state laws, Inglis will take disciplinary action. Disciplinary action will range from a verbal warning to termination of employment. The severity of discipline will be reviewed case-by-case, taking into consideration a number of factors.

Where appropriate, Inglis may also take disciplinary action against department supervisors who failed to detect or report misconduct on the part of team members under their supervision.

The Compliance Office

The Compliance Office oversees the Integrity and Compliance Program. The Chief Integrity Officer and Compliance staff act as a resource for integrity and compliance related questions and concerns. The Compliance Office coordinates and communicates the design, implementation and monitoring of the Integrity and Compliance Program.

The Inglis Compliance Committee

Composed of members from Inglis' management team, this Committee makes final decisions on Inglis' Integrity and Compliance Program and provides oversight of compliance activities for the organization. The Audit and Compliance Committee of the Board of Directors oversees and reviews the activities of Inglis' Integrity and Compliance Program.

You are crucial to ensuring the integrity of Inglis and our continued success.

The success of the Integrity and Compliance Program depends on our commitment to act with integrity, both personally and as an organization. It is your responsibility to read and understand the Code of Conduct and information you receive about the Integrity and Compliance Program, to attend required training programs and to comply at all times with your ethical, professional and legal responsibilities.





**Ability &
Independence.
Redefined.**

inglis.org

2600 Belmont Avenue
Philadelphia, PA 19131

