**Ridgeview Behavioral Hospital**

**Compliance Program Code of Conduct**

Ridgeview Behavioral Hospital is engaged in the business of providing services in a safe, compassionate treatment environment for each patient and developing individualized and multi-disciplinary treatment plans to meet specific clinical needs of each patient.

Ridgeview Behavioral Hospital and (1) Ridgeview Behavioral Hospital employees; (2) Ridgeview Behavioral Hospital managers and officers; and (3) independent contractors, consultants, and vendors who perform functions, on behalf of Ridgeview Behavioral Hospital, associated with the authorization, monitoring or provision of Ridgeview Behavioral Hospital health items or services, including billing and coding contractors ((1), (2) and (3) collectively referred to as “Associates”), constantly strive to ensure that all activity by, on behalf of or with the organization is in compliance with applicable laws, rules, regulations and other directives of federal, state and local governments, departments and agencies (collectively, “Laws, Rules and Regulations”).

The general principles articulated in this Code of Conduct are intended to provide guidance to individuals in their obligation to comply with Laws, Rules and Regulations. However, the general principles contained herein are neither exclusive nor complete. Associates are expected to refer to Ridgeview Behavioral Hospital’s compliance program policies and procedures (the “Compliance Manual” or the “Manual”) and Ridgeview Behavioral Hospital’s overall compliance program (the “Compliance Program”) (which includes, without limitation, procedures regarding billing, payments, medical necessity, quality of services, governance, mandatory reporting, credentialing, and other risk areas) for further guidance. It is important for all Associates to recognize that they are required to comply with all Laws, Rules and Regulations, as well as Ridgeview Behavioral Hospital’s Compliance Manual and overall Compliance Program, whether or not specifically addressed in this Code of Conduct. If questions regarding the existence of, interpretation or application of any law, regulation, rule, standard, policy and/or procedure arise, they should be directed to Ridgeview Behavioral Hospital’s CO. Requests for access to the Compliance Manual should also be directed to Ridgeview Behavioral Hospital’s CO.

Ridgeview Behavioral Hospital expects each individual to whom this Code of Conduct applies to abide by the principles in this Code of Conduct and to conduct the business and affairs of the organization in a manner consistent with the general policies set forth herein.

Nothing in this Code of Conduct is intended to, nor shall be construed as, providing any additional employment or contractual rights to employees and contractors or other persons.

* 1. TREATMENT

***Each patient deserves to be treated as an individual***

Professionals associated with facilities develop individualized treatment plans to meet the specific clinical needs of every patient, utilizing a multi-disciplinary approach. Treatment is provided for inpatient care, residential care, partial hospitalization, outpatient care and/or other behavioral healthcare services. The Company is committed to creating a safe, compassionate treatment environment where patients and their families begin to understand their individual illnesses as well as the recovery process.

***Patient and family information and education***

As soon as possible, information is provided on the anticipated treatment plan as well as financial and insurance information. Discharge planning begins at the time of admission and continues throughout the treatment process. The patient, patient’s family, and the clinical team may be involved in the discharge planning process. Patients are discharged with an aftercare or follow-up plan, which includes interaction with community organizations, and support groups whenever appropriate. The Company does not admit or discharge patients on the basis of their insurance coverage, or lack thereof, but, in non-emergency cases, an individuals’ financial situation is taken into account as part of the treatment process.

* 1. Legal Compliance

 Ridgeview Behavioral Hospital and its Associates shall refrain from any illegal conduct including, but not limited to:

* + 1. Fraud, Waste & Abuse/False Claims. Ridgeview Behavioral Hospital expects its Associates to refrain from conduct which may violate any federal and state laws relating to health care fraud and abuse. Without limiting the foregoing, each Associate is expected to: a) maintain honest and accurate records of services provided; b) follow current and applicable laws, regulations and guidelines to facilitate proper documentation of services and proper claims development and submission; and c) take necessary steps to prevent the submission of claims for payment and reimbursement of any kind that are fraudulent, abusive, inaccurate or medically unnecessary.

Ridgeview Behavioral Hospital intends to fully comply with the federal False Claims Act (“FCA”) and any similar state laws that fight fraud, waste and abuse in government healthcare programs. Examples of fraud, waste and abuse that can be considered to be false claims include billing for services not rendered or goods not provided, falsifying records to obtain payment or a higher rate of reimbursement or unlawfully giving health care providers inducements in exchange for referrals for service. The FCA and similar state laws contain a qui tam or whistleblower provision, which permits a private person with knowledge of a false claim to file a lawsuit on behalf of the government and to receive a portion of the recovery. Under both the FCA and similar state laws, Associates are protected against retaliation for good faith reporting of false claims and fraud, waste or abuse.

* + 1. Licensure/Certification. Ridgeview Behavioral Hospital may operate programs that from time to time are licensed and/or certified by state and federal agencies. All Associates must comply with all licensure and certification laws applicable to Ridgeview Behavioral Hospital’s operation. Associates are expected to participate in educational “in-services” offered by Ridgeview Behavioral Hospital and by various professional groups and associations, and to be familiar with the laws that affect their specific job responsibilities. Certain Associates are required to hold professional licenses or other certifications by state and federal regulating authorities. Associates must notify their supervisor immediately upon the loss, revocation, suspension, or limitation of the Associate’s license, or upon a known or suspected violation of law, rule or regulation.
		2. Tax. Ridgeview Behavioral Hospital and its Associates will accurately report payments to appropriate taxing authorities and will file all tax returns and other information in a manner consistent with applicable laws.
		3. Discrimination. It is Ridgeview Behavioral Hospital’s policy to treat patients, employees, and contractors, etc. without regard to race, color, religion, sex, gender identity, ethnic origin, age, disability, or any other classification protected by law. Ridgeview Behavioral Hospital recruits, hires, trains, promotes, assigns, transfers, lays off, recalls, and terminates employees and contractors based on their ability, achievement, experience and conduct without regard to race, color, religion, sex, gender identity, ethnic origin, age, disability or any other classification protected by law. No form of harassment or discrimination on the basis of sex, race, color, disability, age, religion or ethnic origin or disability or any other classification protected by law will be permitted. Each allegation of harassment or discrimination should be promptly reported to the CO so that it can be investigated, and appropriate action can be taken.
		4. Lobbying/Political Activity. Neither Ridgeview Behavioral Hospital nor any Associate shall make any agreement to contribute any money, property, or services at Ridgeview Behavioral Hospital’s expense to any political candidate, party, organization, committee or individual in violation of any applicable law. Associates may personally participate in and contribute to political organizations or campaigns, but they must do so as individuals, not as representatives of Ridgeview Behavioral Hospital, and they must use their own funds. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is absolutely prohibited.
		5. Kickbacks, Inducement, and Self-Referrals. Ridgeview Behavioral Hospital and its Associates shall comply with all laws relating to kickbacks, inducements, and self-referrals. Ridgeview Behavioral Hospital and its Associates shall not knowingly offer, pay, solicit, or receive bribes, kickbacks, or other improper remuneration in order to induce health care business, recommendations, or referrals.

Ridgeview Behavioral Hospital and its Associates shall not submit any claim to Medicare or Medicaid for certain services classified as “designated health services,” if the order or referral comes from a physician with whom Ridgeview Behavioral Hospital has a prohibited financial relationship, as defined in the Stark physician self-referral law and regulations (the “Stark Law”). Ridgeview Behavioral Hospital shall ensure that all financial relationships (including gifts) with referring physicians meet an applicable Stark Law exception.

* + 1. Excluded Individuals. Ridgeview Behavioral Hospital will not employ or contract with an individual or do business with any person or entity that has been excluded in the OIG or General Service Administration’s federal databases or otherwise debarred or excluded from any governmental healthcare program.
		2. Antitrust. Ridgeview Behavioral Hospital and its Associates shall comply with antitrust laws, which aim to protect competition by prohibiting price fixing, monopolies and other practices that restrain trade. Associates must never discuss pricing, strategies, suppliers, or territories with competitors. Associates must never make agreements (formal or informal) with competitors about allocating markets, boycotting third parties, or other competitive issues. If such discussions arise, Associates should immediately end the discussion, and report it to the CO.
	1. Business Ethics

Associates shall perform their duties in good faith and to the best of their ability and shall not obtain any improper personal benefit by virtue of their relationship with Ridgeview Behavioral Hospital.

* + 1. Honest Communication. Ridgeview Behavioral Hospital requires honesty from individuals in the performance of their responsibilities and in communication with Ridgeview Behavioral Hospital’s attorneys and auditors. No Associate shall make false or misleading statements to any state or federal officials; investigator; or person/entity doing business with Ridgeview Behavioral Hospital. Associates shall not destroy or alter Ridgeview Behavioral Hospital information or documents in anticipation of or in response to a request for documents by any applicable government agency or from any court.
		2. Proprietary Information. Ridgeview Behavioral Hospital Associates shall not steal information belonging to another person or entity, including from Ridgeview Behavioral Hospital, or use any publication, document, computer program, information, or product in violation of a third party’s interest in such product. All Associates are responsible for ensuring that they do not improperly copy documents or computer programs in violation of applicable copyright laws or licensing agreements for their own use. Associates shall not use confidential business information obtained from competitors or pre-employment agreements, in violation of a covenant not to compete, or in any other manner likely to provide an unfair competitive advantage to Ridgeview Behavioral Hospital. Associates shall not use confidential or proprietary information about Ridgeview Behavioral Hospital for their own personal benefit or for the benefit of any other person or entity, except Ridgeview Behavioral Hospital
		3. Marketing.

***The Ridgeview Behavioral Hospital’s best advertisement is the Ridgeview Behavioral Hospital itself***

Ridgeview Behavioral Hospital facilities do not use advertisements or marketing programs, which cause confusion between our services and those of our competitors. We do not disparage the service or business of competitors.

***Ridgeview Behavioral Hospital’s advertising is truthful and not misleading***

Ridgeview Behavioral Hospital complies with all state and federal requirements concerning advertising. All advertising and marketing materials will be submitted to the President for approval prior to distribution. Specific claims about the quality of the Ridgeview Behavioral Hospital’s services will be supported by evidence substantiating such claims. All price advertising will accurately reflect the true charge for services provided to our patients.

* + 1. Business Relationships/Conflict of Interests. Associates shall not engage in any business practice intended to unlawfully obtain favorable treatment or business from any person or organization. All business relations with customers, vendors or contractors of Ridgeview Behavioral Hospital must be conducted at arm’s length and be commercially reasonable, both in fact and in appearance, and in compliance with Ridgeview Behavioral Hospital’s Compliance Program. Associates shall not use their position at Ridgeview Behavioral Hospital to profit personally or to assist others in profiting in any way at the expense of Ridgeview Behavioral Hospital. Associates shall disclose to the CO any financial interest, ownership interest, or any other relationship they (or a member of their immediate family) have with Ridgeview Behavioral Hospital’s vendors, customers or competitors, as well as personal relationships and business activities that may be construed by an impartial observer as influencing the Associate’s performance or duties or otherwise as a conflict of interest. Associates have a responsibility to obtain clarification from management on questionable issues that may arise.

It is illegal to purchase and sell securities of a publicly traded company based on material non-public information. While Ridgeview Behavioral Hospital is not a publicly traded company, many of its vendors, customers and business partners are. Associates shall not use non-public, material information about Ridgeview Behavioral Hospital or any other company for any business activity conducted by or on behalf of Ridgeview Behavioral Hospital or for Associate’s own purposes, nor shall Associates discuss or divulge such non-public information with others.

* + 1. Financial Reporting. All financial reports, cost reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction.
		2. Travel and Entertainment. Travel and entertainment expenses should be consistent with the Associate’s job duties. Associates are expected to exercise reasonable judgment in the use of Ridgeview Behavioral Hospital’s assets. Associates must also comply with Ridgeview Behavioral Hospital policies relating to travel and entertainment expense.
		3. Personal Use of Corporate Assets. All Associates are expected to refrain from converting assets of Ridgeview Behavioral Hospital to personal use. All business of Ridgeview Behavioral Hospital shall be conducted, and Ridgeview Behavioral Hospital property utilized, in a manner designed to further Ridgeview Behavioral Hospital’s interest rather than the personal interest of an individual Associate. Associates are prohibited from the unauthorized use or taking of Ridgeview Behavioral Hospital’s equipment, supplies, materials or services.
		4. Courtesies, Gifts and Entertainment. Except as expressly allowed by Ridgeview Behavioral Hospital’s Policy on Courtesies, Gifts and Entertainment with Business Referral Sources, Ridgeview Behavioral Hospital and its Associates shall not offer entertainment, gifts or tokens of appreciation to, or receive the same from, a Referral Partner. “Referral Partner” means a person or organization that is in a position to refer business to, purchase services from, or recommend the services of the provider of the gift. Note that, depending on the situation, Ridgeview Behavioral Hospital may be the Referral Partner to whom gifts are offered, or the offeror of gifts to the Referral Partner. Under no circumstance shall Associates accept from, or offer or give to, a Referral Partner cash or cash-equivalents (e.g., gift certificates, financial instruments such as checks or stocks). If an Associate is approached by a Referral Partner seeking to exchange gifts or payment for business, the Associate should politely but firmly decline such an offer and report the incident to the CO immediately.
		5. Services for Competitors or Vendors. No Associate shall perform work or render services for any competitor of Ridgeview Behavioral Hospital or for any organization with which Ridgeview Behavioral Hospital does business or which seeks to do business with Ridgeview Behavioral Hospital, without the approval of a member of Ridgeview Behavioral Hospital’s CO. No Associate shall be a director, officer, or consultant of an outside organization, nor permit his/her name to be used in any fashion that would tend to indicate a business connection with such organization without the prior approval of a member of the CO. The prohibitions in this section apply only when such work or services are substantially related to the work or services being performed by the Associate for Ridgeview Behavioral Hospital.
	1. Confidentiality

Ridgeview Behavioral Hospital and its Associates are in possession of and have access to a broad variety of confidential, sensitive and proprietary information. Every Ridgeview Behavioral Hospital Associate has an obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

* + 1. Protected Health Information. Associates can only use and disclose protected health information as permitted by all applicable Laws, Rules and Regulations and Ridgeview Behavioral Hospital’s Compliance Program.
		2. Ridgeview Behavioral Hospital Information. Information pertaining to Ridgeview Behavioral Hospital’s competitive position or business strategies should be protected and shared only with Associates having a need to know such information in order to perform their job responsibilities. Such information may include, but is not limited to, payment and reimbursement information, information relating to negotiations with employees and contractors or third parties, quality assurance materials, trade secrets, and protocols and documentation developed in order to operate Ridgeview Behavioral Hospital.
		3. Personnel Information. Salary, benefits, and other personal information relating to Associates shall be treated as confidential. Personnel files, payroll information, disciplinary matters and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Associates must exercise due care to prevent the release or sharing of information beyond those persons or outside entities that may need such information to fulfill their job function or duties under the law.
	1. VENDOR/CUSTOMER relationships

Ridgeview Behavioral Hospital and its Associates shall not enter into any financial relationships with any vendor or customer that would violate the prohibitions of the federal Fraud and Abuse Statutes, physician self-referral prohibitions, Internal Revenue Service rules/regulations or any other related Laws, Rules and Regulations.

* 1. ACKNOWLEDGEMENT AND ANNUAL DISCLOSURE STATEMENT

Ridgeview Behavioral Hospital requires that its Associates sign an acknowledgement confirming that they have received and read this Code of Conduct, have been given access to the Compliance Manual and that they understand it and will comply with them (“Acknowledgement”).

Additionally, all Associates are required to complete an Annual Disclosure Statement regarding conflicts or potential conflicts of interest they may have and to continuously update the information in the statement, as necessary. Failure to complete the Annual Disclosure Statement or failure to provide complete and accurate information may result in disciplinary action, including in certain circumstances, termination of employment. In addition to the information requested of all employees and contractors, Ridgeview Behavioral Hospital may from time to time ask certain Associates in very senior level or sensitive positions to provide additional information.

* 1. OVERSIGHT BY CO

The Ridgeview Behavioral Hospital CO will report to the Chief Executive Officer. The CO shall review all material issues of interpretation of this Code of Conduct with the Board or appropriate committee of the Board and each of the relevant Ridgeview Behavioral Hospital companies.

* 1. REPORTING OF VIOLATIONS
		1. Illegal acts or improper conduct may subject Ridgeview Behavioral Hospital to severe civil and criminal penalties, including large fines and being barred from certain types of business. In many cases, if Ridgeview Behavioral Hospital discovers and reports illegal acts to the appropriate governmental authorities, Ridgeview Behavioral Hospital may be subject to lesser penalties.

Therefore, any Associate who believes or becomes aware of any actual or suspected violation of this Code of Conduct, Laws, Rules and Regulations, or Compliance Manual or Program by any employee or another person acting on Ridgeview Behavioral Hospital’s behalf shall promptly report the violation or illegal activity in person, by phone, or in writing, to the Associate’s direct supervisor, the CO, via Ridgeview Behavioral Hospital’s Compliance Hotline or the Corporate Compliance email.

* + 1. It is a violation of this Code for Associates, including management, employees, and contractors, not to report actual or suspended violations of the Code of Conduct, Laws, Rules and Regulations, or Compliance Manual or Program. If you have a question about whether particular acts or conduct may be illegal or violate the Code, you should contact the CO. It is a violation of this Code for Associates to whom a potential illegal act or violation of the Code is reported to not ensure that the illegal act or violation of the Code comes to the attention of those responsible for investigating such reports.
		2. It is Ridgeview Behavioral Hospital’s policy to investigate reports of actual or suspected violations of this Code of Conduct, Laws, Rules, and Regulations, or Compliance Manual or Program promptly and thoroughly. Associates must cooperate with these investigations and shall not take any action to prevent, hinder, or delay discovery and full investigation of illegal acts or violations of this Code.

Associates may anonymously report actual or suspected violations of this Code of Conduct, Laws, Rules and Regulations, or Compliance Manual or Program, via the Compliance Hotline outlined in Paragraph two (2) above. To the extent permitted by law, reasonable precautions will be taken to maintain the confidentiality of those individuals who report illegal activity or violations of this Code, whether or not it turns out that improper acts occurred.

* + 1. No reprisals, retaliation or disciplinary action will be taken or permitted against an Associate for good faith reporting of, or cooperating with the investigation of, actual or suspected violations of this Code of Conduct, Laws, Rules and Regulations or Compliance Manual or Program.
		2. Associates who violate this Code or commit illegal acts are subject to discipline up to and including dismissal. Associates who report their own illegal acts or improper conduct, however, will have self-reporting taken into account in determining the appropriate disciplinary action.
	1. CONCLUSION

This Code of Conduct reflects standards that Ridgeview Behavioral Hospital believes to be in the best interest of its employees, contractors, patients, vendors, and others with whom it does business. However, in addition to the specific directives set forth in this Code of Conduct, each Associate’s own individual judgment is critical in determining the correct course of action for a particular situation. As each Associate contemplates a situation, the Associate should consider whether the proposed action or inaction is consistent with Ridgeview Behavioral Hospital practices and whether it conforms to the letter and the spirit of this Code of Conduct. Additionally, whenever an Associate sees a situation in which the purpose of this Code of Conduct does not appear to be served, the employee or contractor must bring the concern to the attention of the CO.

Ridgeview Behavioral Hospital thanks you for your cooperation with this Code of Conduct and for upholding the high standards of Ridgeview Behavioral Hospital.