



# EMPLOYEE CODE OF CONDUCT & *Business Ethics Handbook*

AegisTherapies.com • 877-877-9889



# Our Mission

Our mission is to *inspire* change, *impact* lives and *innovate* to drive success.



**INSPIRE**



**IMPACT**



**INNOVATE**





# Welcome

This handbook includes important information about many of the company's policies, procedures and guidelines you will be expected to adhere to. Please contact your supervisor or your local HR Business Partner with questions about a policy or about the information included in this handbook. This handbook replaces and supersedes all previous employee handbooks and Code of Conduct issued by the Company. The information presented in this handbook and Human Resources policies may be updated as needed. The company will communicate changes as appropriate. Statutory requirements and human resources policies may supersede some of the contents of this handbook.

## Overview and Expectations

Congratulations, and welcome to Aegis Therapies. As one of the nation's leading contract rehabilitation and wellness services providers, you are joining a team of professionals who apply proven techniques to help individuals move through life. We are dedicated to meeting the needs of our employees, who work daily to provide quality care across all settings. Aegis specializes in offering services that adapt to each person's individualized needs. By doing so, we can ensure our employees are able to do what they do best — provide the highest quality of care to each individual we serve.

Our therapists use leading-edge technology and innovation to help restore strength and confidence after illness, injury or surgery and assist each person in returning to the activities they love with targeted rehabilitation services provided in both inpatient and outpatient settings.

You have been asked to join our team because we are confident in your abilities, knowledge and past performance.

We feel your skills and experience will support and reflect our mission, values and goals, and we are excited to welcome you to Aegis.

## What Is An Employee?

Throughout this handbook, you will be referred to as an employee. We place great value on your role as a member of Aegis Therapies supporting our residents and patients by providing the highest quality of care and compassion.



# Our Philosophy

We believe the work that we, as employees, do is a privilege. Every day we help people become healthier, feel stronger, and maintain their ability to enjoy their families, friends and favorite activities.

This is why our employees are so valued and your success is important to us. Therefore, the company has a desire to:

- Treat you with dignity and respect
- Help you to be successful in your job
- Provide a safe work environment
- Recognize and reward contributions you make to the company
- Acknowledge that you are a critical resource for the company
- Encourage you to bring ideas, concerns and problems to your immediate supervisor
- Offer opportunities for long-term career growth through education and promotion

## Equal Employment Opportunity

Aegis Therapies is an equal opportunity employer, providing equal employment opportunity to all applicants and employees without regard to race, color, creed, religion, gender, marital status, sexual preference or orientation, gender identity, national origin, age, protected veteran status, disability or any other protected status, in accordance with applicable federal, state and local laws. The Company is committed to providing reasonable accommodations to qualified individuals with disabilities under the Americans with Disabilities Act, or similar State Laws, unless the accommodations would impose an undue hardship. Specifically, Aegis Therapies, Inc. provides reasonable accommodations to ensure equal opportunity in the application process, to enable a qualified individual with a disability to perform the essential functions of a job, and to enable an employee with a disability to enjoy equal benefits and privileges of employment.

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, Aegis Therapies, Inc. asks that you do not provide any genetic information when seeking an accommodation or requesting medical leave. "Genetic Information," as defined by GINA, includes a person's family medical history, the results of a person's or their family member's genetic tests, the fact that a person or their family member sought or received genetic services, and genetic information of a fetus carried by a person or a person's family member, or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

Equal opportunity has been and continues to be both policy and practice at Aegis Therapies and applies to every aspect of the employment relationship. If you ever feel that this policy is not being followed, you should immediately discuss it with your supervisor or contact your HR Business Partner.



## Introduction to Our Code of Conduct and Business Ethics

At Aegis Therapies, we understand and accept our responsibilities to provide quality care, to respect the dignity of our patients, to always act in accordance with our values and to comply with all applicable laws and regulations. Our mission calls on each of us to inspire change, impact lives and innovate to drive success.

Healthcare laws and regulations change, and situations involving ethics can be complicated. While our commitment and our responsibilities are clear, sometimes it is difficult to know what to do in certain situations. That is why we have developed our Code of Conduct and Business Ethics (Code) and provided you with resources to help you understand our standards and expectations, and to help you make good choices for Aegis Therapies, for our patients and for you.

## Application Of the Code

This Code of Conduct and Business Ethics provides the ethical guidelines and expectations for conducting business on behalf of Aegis Therapies. The Code applies to all directors, company officers, employees and vendors. Vendor conduct and behavior can have an impact on the company and its reputation. For this reason, vendors are expected to conduct their businesses in a legal and ethical manner and to meet all applicable contractual obligations.

## Accountability Under the Code

The Code details the fundamental principles, values and framework for action within our organization. While not an employment agreement, the Code sets guidelines and standards to help guide your behavior and actions in common circumstances. It states our basic commitment to compliance, which supports our corporate culture of acting with integrity even if no one is watching. We value and reward the prevention, detection and resolution of quality of care and compliance issues. Each of us is accountable for our own behavior. Compliance with this Code is a condition of employment at Aegis Therapies. Failure to follow its principles is the basis for disciplinary action up to and including termination. This Code may be revised from time to time, to ensure that our company continues a culture of good business ethics and compliance.





## Reporting Possible Violations

Aegis Therapies has the opportunity to improve every time you ask a question or raise a concern. When you speak up to clarify a policy or report questionable conduct, you are protecting your colleagues, the interests of patients and the reputation of Aegis Therapies. Remember, an issue cannot be addressed unless it is brought to someone's attention.

### Where to Go for Help

You have the option to ask questions and the obligation to report possible compliance, ethical or legal violations by using any of the methods in Aegis Therapies' Four-Step Process.

The Four-Step Process has been designed to give those closest to the employee the opportunity to address matters as they arise. The process then allows for matters to be advanced progressively upward through the company to the executive level, as appropriate.

### The Four-Step Process

1. First, talk to your supervisor. He or she will be familiar with the laws, regulations and policies that relate to your work and will be able to handle most matters.
2. If you are not comfortable talking with your supervisor (for example, if you are questioning the actions of your supervisor), talk to your supervisor's supervisor or your Human Resources representative.
3. If you feel the matter cannot be handled at your local level, contact your Vice President as your compliance liaison.
4. If none of the above steps resolve your questions or concerns or if you prefer, at any time you can call the toll-free Customer Response and Compliance Hotline at 833-717-0807. All calls are confidential, and you may remain anonymous if you choose. TDD is available. You may also file a report online at: [www.lighthouse-services.com/aegistherapies](http://www.lighthouse-services.com/aegistherapies)

### When Should I Call The Customer Response & Compliance Hotline?

You should call the Compliance Hotline at 833-717-0807 any time you are aware of an actual or potential violation of the Code of Conduct, and you feel that you cannot go to your supervisor or to the other personnel designated in the Four-Step Compliance Communications Process.

Our company requires all employees who have knowledge of any suspected abuse, neglect, mistreatment or misappropriation, or who have reasonable suspicion that a crime has been committed, to report the incident, consistent with the requirements of both federal and state laws, within the company and to the appropriate outside agencies. If you experience or witness conduct you believe, in good faith, is contrary to the handbook, the law or company policy, you have an obligation to report your concerns using Aegis Therapies' Four-Step Process or by contacting the Compliance Hotline. Your failure to fulfill this obligation is itself a violation of this handbook with the potential to be grounds for disciplinary action up to and including termination. Failure to report could affect your rights in pursuing legal action.



### **Customer Response and Compliance Hotline Process**

1. You will be given the option to remain anonymous.
2. A third-party interview specialist will document your concern in detail.
3. Information provided will be relayed to the Compliance Department for appropriate follow-up and investigation.
4. You will be provided with information on how you can access status updates or answer additional questions.
5. All reports submitted are handled promptly and discreetly.

*The Compliance Hotline is available 24 hours a day, seven days a week. Calls to the Compliance Hotline or online reporting may be made anonymously — although this may make it more difficult to investigate and resolve your concern if you fail to provide enough information.*





## Retaliation Is Prohibited

Regardless of the type of misconduct reported, or the method of reporting, Aegis Therapies will not tolerate any retaliation against anyone who makes a good faith report of an alleged violation of the law, this handbook or the company policies and procedures.

Aegis Therapies takes claims of or reasonable fear of retaliation seriously. All such claims will be thoroughly investigated and, if substantiated, retaliators will be disciplined up to and including termination. If you believe you have been retaliated against, you should report such action using The Four-Step Process or any of the methods described in this handbook.

## Making the Right Choice - The Mirror Test

Making the right decision is not always easy. There will be times when you will be under pressure or unsure of what to do. Always remember when you have a tough choice to make that you are not alone. Your fellow employees and the resources cited throughout this handbook are available to help.

When faced with a difficult compliance or ethical decision it may help to pause and ask yourself these questions:

- Is it the right thing to do?
- Is it legal?
- Is it consistent with our Code, policies and procedures?
- Have I considered all the options?
- Will I be comfortable telling others about my decision?
- If it was subsequently made public, can I honestly say I'd be proud of the choice I made?
- What is the possible impact of my actions on others?







## Employee Responsibilities

If you are an employee you are expected to meet the following responsibilities:

- Always act in a professional, honest and ethical manner when acting on behalf of the company.
- Be familiar with the information contained in this handbook as well as applicable laws and with company policies. Pay particular attention to the policies that pertain to your job responsibilities.
- Complete all required ethics and compliance training in a timely manner and apply it in your job tasks every day.
- Keep up-to-date on current standards and expectations.
- Promptly report concerns about possible violations of laws, regulations, this handbook and policies to your supervisor or to the resources listed in our Four-Step Process.
- Cooperate and tell the whole truth when responding to an investigation or audit.
- Employees that are in a job that requires a current certificate and/or license are responsible to maintain current certificate and/or licensure and must provide that information to the company in a timely manner. Not maintaining current certificate and/or licensure is a violation of the handbook and employee may be subject to discipline under our policies.
- Maintain accurate and complete records for all business purposes, and never alter or destroy records in response to an investigation, or when an investigation is anticipated.
- Acknowledge your acceptance of the handbook through Workday.
- If convicted of criminal conduct, excluded or prohibited from participating in a federally funded program, notify your supervisor within five (5) days.

## Leadership Responsibilities

If you are a supervisor you are expected to meet the following additional responsibilities:

- Lead by example. Leaders are expected to exemplify the highest standards of ethical business conduct.
- Be a resource for others. Communicate to employees and business partners about how the Code and policies apply to their daily work.
- Be proactive. Look for opportunities to discuss and address ethics and ethically challenging situations with others.
- Create an environment where compliance is recognized and valued and where everyone feels comfortable asking questions and reporting potential violations of the Code and policies.



- Never ask or pressure anyone to do something that you would be prohibited from doing yourself.
- Be aware of the limits of your authority, and do not take any action that exceeds those limits.
- Delegate authority only where permissible, and never delegate authority to any individual who you believe may engage in unlawful conduct or unethical activities.
- If you supervise third parties, ensure that they understand their ethics and compliance obligations.
- Managers and leaders with direct reports in a job that requires a current certification and/or license are responsible for ensuring that the employee maintains current certification and/or licensure information and the information is current in the company systems. Managers and leaders are held accountable to not schedule hours for anyone who does not have a current certification and/or license on file. Not complying will be considered a violation of the Code and you may be subject to discipline under our policies.

## Accountabilities and Discipline

Aegis Therapies has adopted this handbook to detail for you the fundamental principles, values and framework for action within our company. The handbook states our commitment to compliance and fosters a culture that values and rewards quality and achieves all business results with integrity. From the Board of Directors to each and every employee, we share accountability for maintaining our culture and values.

Procedures are in place to audit and monitor performance and to report, without fear of retaliation, any credible evidence of misconduct. Prompt reporting of concerns will help the Compliance Department address and remedy the problem. In consultation with Human Resources, policies and procedures are also in place to discipline those who are found, after thorough investigation, to have violated the law, this handbook or our policies and procedures.



# Our Responsibilities to Our Patients

## Conduct with Patients

Our patients are the heart of our business. All patients must be treated with respect and dignity at all times. As an employee and as a caregiver you must work to promote an atmosphere favorable to excellent care and document that care accurately and thoroughly. As a manager and supervisor your duty is to ensure that adequate resources, including staffing, are available to maintain professionally acceptable standards and provide the necessary care and services to all.

- Treat patients professionally and with respect.
- Make reasonable efforts to accommodate their needs and preferences and honor their rights.
- Maintain a safe patient care environment at all times.
- Maintain at all times an atmosphere free from verbal, sexual, physical and mental abuse; corporal punishment; and involuntary seclusion.
- Help patients to secure their property.
- Protect our patients' funds. Any employee who is found to have tampered with or stolen a patient's funds — whether from the patient's trust account, a separate account or the patient — will be subject to disciplinary action up to and including termination.
- Do not date or have any sexual contact with patients, even if consensual. Any employee who violates this company policy will be subject to disciplinary action up to and including termination.
- Immediately report any abuse or neglect issues you witness or any reasonable suspicion of a crime to appropriate authorities.

## No Gifts, Tips or Loans

Employees are prohibited from soliciting, accepting or offering tips, gifts or loans from residents, family members or from anyone with whom the company does business.

- If an employee wishes to purchase personal property from a resident, the employee must have prior approval of the Compliance Officer, the purchase must be made in an open-market setting with all details disclosed, and the purchase must be made at fair-market value.
- Employees and agents of the company are prohibited from soliciting or accepting offers of loans from residents, family members of residents or vendors regardless of amount or intent to repay.



- Employees may not accept favors, gifts or tips from residents, families or others that compensate or reward an individual employee.

## Signing Documents as a Witness or Notary

Employees who are not acting in the official capacity of a notary public shall not serve as witness for any legal documents concerning a resident's wishes regarding:

- Disposition of property or assets
- Termination of treatment or any other aspect of care
- Control of property or other assets

In order to prevent situations where the perception is that the caregiver (you as an employee or any vendor) used undue influence over a patient, employees are not allowed to be participants in the sale and/or purchase of a patient's assets.

## Protecting Patients' Privacy

One of the most important ways we respect our patients is to protect their privacy, which includes, but is not limited to, safeguarding their medical records, their personal information and their identity.

Patient information is protected by state and federal privacy laws, including the Health Insurance Portability and Accountability Act (HIPAA), and must be kept confidential. Original copies of medical records should never leave the facility unless authorized by the Privacy Officer or the Legal Department. A patient or the patient's legally authorized representative may request a copy of his or her own medical records orally or in writing.

Additionally, other individuals or entities may request and receive a copy of the medical records if the proper consent and/or authorization is obtained from the patient or his/her legally authorized representative. If a question arises as to whether a patient has the capacity to authorize the release of records, or whether the individual requesting the medical records is entitled to have them, the Privacy Officer and Records Management Department should be contacted before providing the requested copies.

Aegis Therapies must obtain the patient's authorization when using a personal image or testimonial for the production of company communication materials that will be used for any of the following Aegis-led purposes: community relations initiatives, social events, announcements and promotions, social outreach, and other community activities.

Authorization forms can be obtained by contacting the Aegis Therapies Communications Department at 972-372-6766 or [AegisTherapiesCommunication@AegisTherapies.com](mailto:AegisTherapiesCommunication@AegisTherapies.com).

- Be thoughtful about where, when and how you discuss patients' information. Do not do so in a place where you may be overheard.



- Share patients' confidential information only with those who need to know it for clinical or business purposes.
- Do not use patients' confidential information, identity or image for your own personal use, including but not limited to images and social media.
- Do not take originals or photocopies of medical records from the facility without the approval of the Privacy Officer and Legal Department.
- Do not allow patients or patients' information to be subjected to experimental research or treatment without the patient's informed and written consent. Any experimental research or treatment must be authorized by the Privacy Officer in accordance with the Health Insurance Portability and Accountability Act.
- Report all privacy and HIPAA violations to the Privacy Officer immediately.

## Creating and Maintaining Clinical and Business Records

Investors, government authorities and others need to be able to rely on the accuracy and completeness of our clinical and business records. Accurate and accessible information is also essential within the company so that we can make good clinical and business decisions.

Aegis Therapies is committed to transparency and to making full, accurate, timely and understandable disclosure on all aspects of our business including clinical documentation, billing, cost reports, payroll records, contracts, expense reports, receipts and financial reports that are filed with or submitted to regulatory authorities.

Employees with a role in the preparation of our public, financial, and regulatory disclosures have a special responsibility in this area, but all of us contribute to the process of recording patient information, business results and maintaining documents.

Each of us is responsible for helping to ensure the information we record is accurate, complete, and maintained consistent with our system of internal controls.

- Never make false statements on an expense report, time sheet, staffing roster, clinical documentation, patient assessment, cost report, plan of correction or other business record.
- Always be accurate, complete, and truthful when submitting financial results and clinical documentation.
- Make sure that financial entries are clear and complete, and fully disclose the true nature of any transaction.
- Be as clear, concise, truthful, and accurate as possible when recording any information. Avoid exaggeration, colorful language, guesswork, legal conclusions and derogatory characterizations of people and their motives.



- Never change or tamper with information that has been entered into any record. Follow company policy and all legal requirements when amending records of any kind. Whenever possible, the original author should make corrections after consulting with a supervisor to discuss the reason for the change, the validation that the information being added or changed is accurate, and the proper methodology for making the correction.
- Never sign a blank order, form, note or another document that you know of or suspect that information will be added later above your signature. Never accept such a pre-signed document, including physician orders, from anyone, and report the matter immediately to your supervisor and to the Compliance Department.
- Only sign documents, including contracts, that you are authorized to sign and that you believe are accurate and truthful. Never sign a document or record for another employee.
- All company contracts are subject to review by the Legal Department for potential conflicts of interest as identified in the Code section titled “Conflicts of Interest.”
- Contract expiration dates will be monitored by the company representative requiring the contract and renewed in a timely manner to prevent using services for which there is no legal agreement.

## Records Management

Aegis Therapies has records management policies and procedures to ensure that our records are maintained, stored, and destroyed, when appropriate, in accordance with our business needs and in compliance with applicable regulations.

Each of us is responsible for information and records under our control. We must be familiar with the record keeping procedures that apply to our jobs and we are accountable for the accuracy and truthfulness of the records we produce. It is also our responsibility to keep our records organized so they can be located and retrieved when needed.

Documents containing sensitive and/or confidential information should be kept in their designated storage locations when not in use. Documents should be retrieved from printers, fax and copy machines in a timely manner. Sensitive information must be disposed of properly — normally shredded or deposited in a designated location for removal and destruction.

Documents should only be destroyed in accordance with our records retention policy, and never in response to or in anticipation of an investigation, audit, claim, lawsuit, or arbitration proceeding. Contact the Privacy Officer or Legal Department if there is any doubt about the appropriateness of record destruction.



## Introductory Period

An introductory period provides both you and the company a time frame to determine if the company is the right environment for you and if you are qualified for and suited to the work to be performed. The introductory period is your first ninety (90) calendar days of employment with the company. All employees are subject to the introductory period. If it is determined during the introductory period that you are not performing satisfactorily or are not suited for the position, you may be terminated without notice during or after the introductory period.

Rehired employees will be required to satisfy a new introductory period upon rehire.

## Employment Classification

There are both exempt and non-exempt employees. If you are a non-exempt employee, this means you are paid on an hourly basis, and if performing community home health visits - on a per visit basis. Non-exempt employees are subject to the overtime provisions of the Fair Labor Standards Act. Definitions of the classifications are listed by company on the following chart:

<p><b>AEGIS THERAPIES:</b> <b>SNF, CCRC,</b> <b>Direct Bill and Corporate Employees</b></p>	<p><b>FULL-TIME</b> — Employees who work an average of 30 hours or more per week. Full-time employees are eligible for benefits.</p> <p><b>PART-TIME</b> — Employees who work an average of between 20 and 29.99 hours per week. Part-time employees are eligible for some benefits.</p> <p><b>PRN</b> — Employees who are not designated for regular schedules of twenty (20) hours or more per week, or employees who work intermittently, as available, or on an as- needed basis, regardless of the number of hours worked per week. PRN employees who fall into the latter category may be free to accept or reject an assignment, but they must complete an assignment once it is accepted. PRN employees may be eligible to participate in selected benefits such as 401K.</p>
<p><b>AEGIS THERAPIES:</b> <b>Home Health Employees</b></p>	<p><b>FULL-TIME NON-EXEMPT</b> — Employees who are Registered Therapists and average 21.75 or more units per week and Therapy Assistants and average 22.5 units per week. Full-time employees are eligible for benefits.</p> <p><b>FULL-TIME NON-EXEMPT (HI)</b> — Employees who are therapists and therapy assistants and average 22.5 or more units per week. Individuals who work part time are eligible or HMSA in HI.</p> <p><b>PART-TIME</b> — Registered Therapists who average 10.88 to 21.75 units per week and Therapy Assistants who average 11.25 and 22.5 units per week. Part-time employees are eligible for some benefits.</p> <p><b>PRN</b> — Registered Therapists who are not designated for regular schedules of twenty (20) hours or more per week or 14.5 units or more per week or Therapy Assistants who are not designated for regular schedules of (20) hours or more per week or 15 units per week, or employees who work intermittently, as available, or on an as-needed basis, regardless of the number of hours worked per week. PRN employees who fall into the latter category may be free to accept or reject an assignment, but they must complete an assignment once it is accepted. PRN employees are eligible to participate in the 401(k).</p>

Important! If you are considering requesting a change in your classification, first discuss this with your supervisor. A classification change may affect your eligibility to receive certain benefits, and it is important that you understand how a change in classification will affect you before it is made. Management will determine if a request for change in employment classification is approved.



## Employment Documents

The company complies with the Immigration Reform and Control Act of 1986 by completing the I-9 form (in conjunction with the new employee), and hires only individuals authorized to work in the United States. During the course of your employment, you will need to update your I-9 form if the following event applies to you:

- Expiration of work authorization

Please contact your supervisor if you have any questions.

## Personal Information

It is your responsibility to manage and update your personal information in our HR Information System (HRIS), Workday. From time to time you may need to access and update personal information such as:

- Home and mailing addresses
- Work and personal email addresses
- Work and home phone numbers
- Emergency contact
- Sign up to receive W-2 online up to five weeks before mailed statements





## Respect, Diversity and Equal Opportunity

Employees work best in an atmosphere of fairness, cooperation and equal opportunity. To promote this atmosphere, we should always treat others with dignity and respect, and value what each of us has to contribute. We must work to maintain a diverse workforce where personnel are hired, retained, compensated, disciplined and promoted solely on the basis of their contribution to the company and their performance. Our diversity is a key asset. Different backgrounds and points of view help to promote innovation and success.

We offer equal employment opportunities to qualified individuals, regardless of race, color, creed, religion, gender, marital status, sexual orientation, national origin, age, veteran status, disability — or any other category protected by law or company policy. Aegis Therapies will not tolerate discrimination or harassment based on these or any other legally protected categories.

- Respect the diversity of all co-workers, business partners, patients, families and visitors.
- Do not distribute or display discriminatory material.
- If you supervise others, judge them on performance. Assign work and make on-the-job decisions solely on the basis of qualifications, abilities and potential. Avoid introducing unrelated considerations into your decisions. Use objective and quantifiable standards.

## Harassment-Free Workplace

Harassment in the workplace is behavior that is unwelcome and offensive to specific individuals or groups, or that unreasonably disrupts their work. Our conduct at work and at company-sponsored and related functions must be professional at all times. We will not tolerate inappropriate physical contact, sexual advances or any other actions, comments, or conduct that is intimidating or otherwise offensive or hostile.

The most common form of workplace harassment is sexual harassment. Sexual harassment may include a range of behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through email); and other physical, verbal or visual conduct of a sexual nature.

All reported occurrences of illegal harassment will be thoroughly investigated in strictest confidence and appropriately dealt with in accordance with our policies.

Maintain a work environment that is professional and free from illegal harassment and retaliation of any kind.

- Do not make discriminatory references to or about any person, especially relating to gender, religion, race or any other protected class.



- Avoid unwanted or otherwise inappropriate physical conduct (such as suggestive gestures, uninvited touching or sexual advances).
- Do not use, distribute or display sexually explicit, vulgar, crude or offensive language, jokes, photographs or other materials.
- If possible, be direct, speak up and tell a person if you are upset by his or her actions or language, explain why and ask him or her to stop. Make a formal complaint if the matter is serious or if you are uncomfortable taking a direct approach.
- Even if you believe your acts or words are innocent, if someone says you are offending them and asks you to stop, do so at once.

## Pay Transparency Policy Statement

As a Federal contractor, Aegis Therapies will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

## Privacy of Personal Information

In recent years, individuals, companies and governments have grown increasingly concerned about the privacy and security of personal information. As a result, laws protecting the privacy of personal information and how it may be collected, shared and used are becoming more common. We have a legal and ethical responsibility to protect the confidential and personal information of our patients and our fellow employees.

- Employees are accountable for protecting personal information and for handling it securely.
- Collect personal information only for legitimate business purposes, and keep it only as long as necessary.
- Take precautions to safeguard personal information when collecting, processing, storing and transferring it.
- When we use third parties to provide services for us, make sure they understand the importance we place on privacy and that they must uphold our standards.



## Protecting Company Assets

We all have a responsibility to use Aegis Therapies' resources wisely, with care and to ensure that our information and property are not misused, damaged, lost, stolen or wasted.

Company assets include, but are not limited to, our physical facilities, equipment, computers, office and cell phones, personal devices and faxes, files and documents, mobile devices, and inventory and supplies. Our assets also include intellectual property and confidential information.

## Proper Use of Aegis Therapies' Electronic Networks and Systems

The company provides various electronic technologies, including personal computers and related software and hardware, voicemail, email and Internet access to authorized employees to assist them in performing their job duties for the company.

- Employees may be supplied with a workstation, mobile device or laptop to perform company business and must not use company-supplied equipment for personal or commercial use outside the parameters provided by your supervisor, Information Technology Department and company policies.
- Do not install any computer software on a company-supplied computer without the approval from an Information Technology Vice President or designee. This includes purchased software, shareware and freeware
- Never copy company-supplied software to any storage media or transfer company-supplied software to another computer.
- Employees must not make any hardware alterations to company-supplied computers.
- Do not store personal files such as photo images, music MP3 files, video files or personal documents on the local hard drive of any company-supplied computer or on any network drive.
- Employees who are issued laptops and mobile devices are responsible for the physical security of the laptop and mobile device.
- A company-supplied computer is the property of the company and there should be no expectation of privacy.
- Email should only be used for business purposes or for statutorily protected communications and the electronic transfer of company information to personal accounts for personal gain is prohibited.
- Email must be written in a manner consistent with the company's Unlawful Harassment Policy (found in the Policy Center).
- Emailing Electronic Protected Health Information outside the company is prohibited unless the email is encrypted.



- Use of company's email system for sending chain email, jokes and non-business-related images is prohibited.
- Email should be considered a method of communication, not a permanent business record. Do not use your email as a "to do list" or filing cabinet for important business information - if an email has such information, find a way to store that as a business record, as email will be routinely and regularly deleted.
- Use of company's email system for solicitation is strictly prohibited with the exceptions of statutorily protected solicitations or for an approved charity.
- Employees are expected to know and adhere to privacy and security policies regarding rules and regulations related to electronic technology.

Aegis Therapies reserves the right to access any file, information, data or other items located on or in Aegis Therapies property. Email and voicemail systems and content on them are supplied for business use only and are considered potential company records and the property of Aegis Therapies.

## Preventing Fraud and Theft

We all have the responsibility to:

- Report any suspicions you may have concerning theft, embezzlement or misappropriation of any company property.
- Handle documents containing sensitive information — including information stored on computer systems — carefully during working hours and secure them properly at the end of the day.
- Keep your computer access password(s) confidential.
- Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on company computers or other equipment to conduct company business is strictly prohibited.
- Lock your computer when it is unattended to protect it from use by unauthorized persons.
- When your employment with the company ends you must return to your supervisor all electronic and paper copies of company information, reports, manuals and other items developed or furnished to you while you were employed at Aegis Therapies.

Look for the following red flags that may indicate inappropriate use of our resources and possible fraud or theft:

- Company property that is not secured when not in use
- Allowing others to borrow or use equipment without approval
- Unknown individuals without proper credentials in our locations
- Any use of company resources for personal purposes



## Confidential Information

One of our most valuable assets is information. The unauthorized release of confidential information can cause Aegis Therapies to lose a critical competitive advantage, embarrass the company and damage our relationships with patients and others. For these reasons, confidential information must be treated carefully. This means it must be accessed, stored and transmitted in a manner consistent with our policies and procedures.

Any information obtained about a company initiative or patients in our care may not be shared, sold or placed electronically or otherwise outside of our company reports, records, manuals and computer systems. In certain situations, the Privacy Officer or Legal Department may direct the release of information when it is related to the best interests of the company or the patient and when it is within appropriate legal boundaries.

Each of us must be vigilant to safeguard company confidential information as well as our patients' confidential information that is entrusted to us. We must keep it secure, limit access only to those who have a need to know and avoid discussion of confidential information in public areas. The obligation to preserve Aegis Therapies' confidential information is ongoing, even after employment ends.

- Use and disclose confidential information only for legitimate business purposes.
- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Retrieve documents from printers, fax machines and copiers in a timely fashion.
- Protect intellectual property and confidential information by sharing it only with authorized parties.
- Never discuss confidential information when others might be able to overhear what is being said (for example on planes, elevators and when using mobile phones) and be careful not to send confidential information to unattended fax machines or printers.



- When a business relationship requires the disclosure of information, disclose only the minimum amount of information necessary to accomplish the function. There must be an understanding and agreement that the information will be kept in strict confidence and used only for the intended purpose.
- Protect confidential information from being viewed by onlookers during data entry or review.
- Log off and power off your workstation when you leave for the day. Supervisors may designate exceptions for shift-change or shift-transition purposes.
- Do not use copyrighted materials without appropriate permission. Confidential information includes:
  - o Patient information (medical and financial)
  - o Future/pending sales, acquisitions and mergers
  - o Pricing and marketing information
  - o Customer and vendor lists
  - o Employee information (names, addresses, home phone numbers, salary or wages, medical data and personnel documents)
  - o The company's strategic business plans
  - o Data developed or purchased by the company or entrusted to us by customers or suppliers if identified as confidential

Company policies do not prohibit employees from disclosing or discussing employee information on terms and conditions of employment (such as wages) so long as the employee did not come into the possession of such information through access which the employee had as part of their formal job duties. This Code and company policies are designed to protect the company, its employees, and patients, rather than to restrict the flow of useful, appropriate, and protected information. Nothing in this Code, or in any company policy, is intended to restrict activity protected by Federal or State law, including the National Labor Relations Act's protections concerning section 7 rights and concerted activity.



# Getting Started On The Job

## Dress and Appearance

It is important that you present a neat and proper appearance to the general public. A well-groomed employee immediately creates a favorable impression of the services we perform. Acceptable clothing should be clean, neat and safe to wear in the workplace.

## Name Badges

When you begin your employment, you will be provided with a name badge. It is a requirement to wear your name badge in accordance with the policies at your location(s). If you are under 18 years of age, you will be issued a special name badge indicating that you are not to work in hazardous areas.

## Work Schedules

Work schedules differ within the company, depending on various business needs, and are subject to change. Your supervisor will inform you of your schedule as well as your meal and break periods. If there is a business necessity to change your schedule, your supervisor will give you as much notice as possible.





## Rest and Meal Periods

It is important for you to take a break from work so you can approach your job refreshed. Therefore, rest breaks may be scheduled for you. Non-exempt employees will receive a 15-minute paid rest break for each four hours of working time or major fraction thereof. An employee is encouraged to remain on the premises during the rest period.

Non-exempt employees are required to take a 30-minute unpaid meal period if they are scheduled to work more than a five-hour shift. Meal breaks must be recorded daily on your time records. You MUST clock out for meal periods and clock back in when returning to work. You cannot eat your meal at your workstation.

Occasionally, your meal break may be interrupted for work or shortened to less than 30 minutes because a supervisor needs you to work. In such cases, the entire meal period becomes time worked, and you will be paid and/or you will receive another 30-minute unpaid meal period at another time during the same shift.

Failure to report an interrupted meal period as required by policy will subject you to disciplinary action, up to and including termination.

You MUST obtain prior approval from your supervisor in order to work through your meal period.

## Attendance

Your customers and co-workers count on you and your regular attendance during work hours. Unsatisfactory attendance, reporting late and/or leaving work early may result in disciplinary action, up to and including termination. The full Attendance Policy can be located in our electronic Policy Center.

## Paystubs, Paychecks and W-2's

Payday is the sixth (6th) day following the end of the pay period unless otherwise designated by state law. A day is a twenty-four (24) hour period beginning and ending as stated below.

**Aegis Therapies provides employees with convenient and secure online access to their pay information through Workday.**

**Aegis (except CA)** - Bi-weekly pay period beginning on Sunday at 12:00 a.m. (midnight) and ending two weeks later on Saturday at 11:59 p.m.

**Aegis (CA)** - Weekly pay period beginning on Sunday at 12:00 a.m. (midnight) and ending the following Saturday at 11:59 p.m.





## Time Records

Non-exempt employees are paid on an hourly basis, and must submit time records so that payroll can calculate their pay. The time record is an invoice to the Company for the employee's time worked. The employee needs to take special care to be sure their record of time worked is accurate.

**Below is the system of recording time worked for corporate and field employees.**

### **Corporate Employees:**

Time is recorded electronically through the Workday system.

### **Field Employees :**

**Hourly (non-exempt) employees:** You must record your time daily in company Electronic Medical Record (EMR) System. Failure to record your treatment time on a daily basis could result in disciplinary action up to and including termination of employment.

Follow these guidelines to ensure your work time is recorded accurately:

- Accurately record your starting and ending times.
- Accurately record your meal periods.
- NEVER work off the clock; it is strictly prohibited. Working off the clock will not benefit the Company or employees, and cannot be approved by your supervisor.
- NEVER record time for any other employee, and NEVER ask someone else to record time for you.





## Benefits Eligibility and Enrollment

The company offers medical plan options and a variety of voluntary insurance plans to meet the needs of you and your family. Eligibility to participate in the Benefits Program is determined by your employment status listed in Workday (full-time, part-time or casual) as defined in the Aegis Therapies Health Plan Summary Plan Description (SPD).

You have 31 days from your hire/rehire event date to complete your benefits enrollment through the benefit enrollment system. Mid-year event enrollment periods may vary depending on the Qualifying Life Event type. For additional information, refer to the Benefits Guide available through Workday by clicking on the Benefits Enrollment application. If you have questions about your benefit enrollment or need assistance, please contact the Benefits Service Center at 855-207-1986. They are available from 6:00 a.m. to 8:00 p.m. Central time, Monday through Friday.

### Mid-Year Changes in Benefits Eligibility

Enrollment elections and changes are allowed after your initial enrollment period only if you have a Qualifying Life Event (QLE) (refer to the applicable Summary Plan Description on HR Online for more information about change events).

The Affordable Care Act requires employees to be appropriately classified based on actual hours worked to determine eligibility for Aegis Therapies healthcare coverage. To be eligible for healthcare coverage, employees must work at least 780 hours during the Measurement period based on a six-month payroll calendar. Employees who are improperly classified as full-time/part-time/casual based on their actual hours worked during the Measurement period must be reclassified for Affordable Care Act purposes only based on actual hours worked.

Eligibility for employee benefits can change due to the reclassification. If you would like to maintain your current classification and eligibility for benefits, you may talk with your supervisor about your work schedule.

## When Should I Call the Benefits Service Center?

If you need assistance enrolling in your benefits, or if you have questions regarding your benefit plan elections or coverage, you are encouraged to call the Benefits Service Center at 855-207-1986. If you have specific questions regarding claims or plan benefits, you should contact the insurance carrier directly.

All other questions regarding your employment should be discussed with your supervisor and/or your HR Business Partner.



## HR Online - My Aegis Benefits

For all your benefits questions, information, and complete plan details, visit MyAegisBenefits on HR Online for important resources:

- Summary of Benefits & Coverage (SBC) – Easy to read summary detail of the key medical plan features, such as covered benefits, cost-sharing provisions, and coverage limitations and exceptions.
- Summary Plan Description (SPD) – Detailed information for specific plan and coverage information, eligibility, claim administrator and appeal process, and more.
- Benefits Guide – Provides information on all benefit plans available through Aegis Therapies, along with rates and carrier contact information. You can also reference the Benefit Required Notices at the back of the Benefits Guide.

If you have questions or need assistance with your benefits enrollment, contact the Benefits Service Center at 855-207-1986. They are available Monday through Friday from 6:00 a.m. to 8:00 p.m. Central Time.

## Enrollment Deadline and Dependent Verification

You have 31 days from the date you become eligible for benefits (new hire, rehire or newly benefit eligible date) to complete your enrollment for benefits and to verify eligible dependents you wish to enroll in coverage. If you do not complete your enrollment within this 31-day enrollment period, you will receive default or waived coverage, whichever is applicable. If you do not submit the required dependent eligibility verification documentation to Mercer before the deadline, your dependents will not be eligible for enrollment.

You must enter the social security number for all covered dependents into the benefit enrollment system to complete your benefit enrollment (this is required by the Centers for Medicare and Medicaid Services (CMS)).

If you miss your initial enrollment opportunity, your next opportunity to enroll will be during Open Enrollment or if you experience a Qualifying Life Event (acquire a new dependent by marriage, birth, adoption or placement for adoption or loss of other coverage) as described in the Benefits Guide and the Aegis Therapies Associate Group Health Plan Summary Plan Description (SPD). If you experience a Qualifying Life Event (QLE), contact the Benefits Service Center or login to the benefits enrollment site to make any election changes within 31 days of the QLE (60 days in the case of birth, adoption, placement for adoption, loss of coverage or becoming eligible for premium assistance under Medicaid or a Children's Health Insurance Program (CHIP)).



## Enrolling for Benefits

Employees enroll for benefits using the Mercer Marketplace 365+ (MM365+) benefits enrollment site, which is accessed by clicking on the “Benefits Enrollment” application button located in Workday. If you need assistance with your enrollment through MM365+, you may call the Benefits Service Center at 855-207-1986 Monday through Friday during the hours of 6:00 a.m. – 8:00 p.m. Central time.

## Employee Assistance Program (EAP) and Work/Life Benefits

The EAP and Work/Life Benefits are confidential and free to all Full-Time and Part-Time Employees. The EAP and Work/Life Benefits can help you and your family members with a wide range of assistance, including:

- Childcare and eldercare referrals
- Financial and legal advice
- Counseling services: free access to three face-to-face counseling sessions per household member, per issue, per calendar year; free unlimited telephonic access to a clinician for brief counseling; available referral to more intensive telephonic counseling that measures progress towards identified goals, identifies barriers to success, and keeps you motivated
- Balancing work and life issues: you may call toll-free 800-327-6764 or log on to [www.magellanascend.com](http://www.magellanascend.com) for resources for work and life issues





## Paid Time Off (PTO)

PTO for planned time off must be requested in writing via our Workday and approved by the employee's supervisor. A specific notice requirement for pre-approved PTO will be determined by your supervisor

Paid Time Off (PTO) can vary depending upon your position. Please refer to the Policy Center for your specific Paid Time Off (PTO) and/or Holiday benefits.

All full-time and part-time employees who have at least three months of service may request a leave of absence without pay for personal or medical reasons. You will be required to use unused time off with pay while on a leave of absence, except where state law provides otherwise.

You may be able to continue participation in current benefit coverage while on leave by paying the required premiums each payday and adhering to the applicable plan requirements. The LOA administrator will advise the employee of the cost of continuing each benefit plan.

## Leaves of Absence

**You must contact FMLASource to request any leave of absence and complete any documentation they request. [www.FMLASource.com](http://www.FMLASource.com) or 877-462-3652.**

### FAMILY AND MEDICAL LEAVE (FML)

Eligible employees may request a family and medical leave (FML) of up to 12 weeks per 12-month rolling period for any of these reasons:

- Incapacity due to pregnancy, prenatal medical care or child birth;
- To care for the employee's child after birth, or placement for adoption or foster care;
- To care for the employee's spouse, son or daughter, or parent, who has a serious health condition; or
- A serious health condition that makes the employee unable to perform the employee's job; or
- Any qualifying exigency arising out of the fact that the spouse, or a son, daughter, or parent of the employee is on active duty (or has been notified of an impending call or order to active duty) in the Armed Forces in support of a contingency operation; or
- To care for a covered service member who has a serious injury or illness incurred in the line of duty on active duty.



FML is unpaid leave; however, you will be required to use any available time off with pay while on leave of absence.

Eligible employees are those employees who have been employed by the Company for at least 12 months and who have worked at least 1,250 hours during the preceding 12-month period, unless state law requires otherwise. Foreseeable requests for FML should be made 30 days in advance or if unforeseeable, as soon as practicable.

You may continue health, dental and vision coverage while on FML, provided you continue making the same contribution toward the premium payments that you made prior to taking leave. You may also continue STD and LTD coverage if the appropriate premium payments are made timely.

You must provide proper notification of your intent to return from FML to your supervisor at least one week prior to your planned return to work from FML. You will be restored to your current position or given a position with equivalent duties, shift, pay, benefits and other terms and conditions of employment.

An employee on FMLA leave should not be asked or permitted to do work unless it is requested or performed on a brief, occasional basis for institutional information or is needed as a professional courtesy around a customer or client relationship. Employees should immediately report any issues regarding being asked to work while on FMLA leave.

### **MILITARY FAMILY LEAVE ENTITLEMENTS UNDER FMLA**

Eligible employees with a spouse, son, daughter or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings. FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the service member medically unfit to perform his or her duties for which the service member is undergoing medical treatment, recuperation or therapy; or is in outpatient status; or is on the temporary disability retired list.

### **NON-FML MEDICAL LEAVE**

You may be granted a medical leave if you are unable to work due to illness or injury, whether work related or not, in 30-day increments for a period of up to sixty (60) days.

You must notify your supervisor in writing as soon as you are aware that a non-FML medical leave will be necessary. You must also provide a doctor's statement and information as to when you will begin your leave and the approximate total length of the leave.



You must notify your supervisor at least 1 week prior to your expected date to return to work. An attempt will be made to place you in the position you held prior to going on leave. If not available, you may be offered an available position similar to the one you held before going on leave and for which you are qualified or you may be separated with eligibility for re-hire.

### **PERSONAL LEAVE**

An unpaid personal leave may be granted for compelling personal reasons. You must have the written approval of your supervisor. A personal leave cannot exceed 30 days. Also, a personal leave cannot be used to extend a medical leave before or after the medical leave. All PTO is to be exhausted before a personal leave begins.

Upon your return, an attempt will be made to place you in the same position or an available position similar to the one you held prior to your leave and for which you are qualified. If not feasible, you may be separated with eligibility for re-hire.

### **MILITARY LEAVE**

Military leave is available the first day of employment. A military leave will be granted in accordance with federal law for related duty. When you return to work, you may be placed in an escalated position, the same position, or one comparable to the one you held prior to your leave as provided by federal and state law. Employees may elect to use PTO time during this leave but will not be required to do so.

### **AMERICANS WITH DISABILITIES ACT (ADA) LEAVE**

A leave may be available without a waiting period and before or after other leaves in accordance with the company's policies as an accommodation pursuant to the Americans with Disabilities Act (ADA) or State disability laws.

## **Bereavement Leave**

Eligible employees may take scheduled workdays with pay to attend to matters relating to the death of their immediate family member per the schedule below:

- Three (3) scheduled workdays with pay will be provided for the following family members: spouse, parents (including step-parents), children (including step-children), and siblings (including step-siblings). Bereavement pay is a maximum of eight (8) hours per day.
- One (1) scheduled workday with pay will be provided for the following family members: mother-in-law, father-in-law, daughter-in-law, son-in-law, sister-in-law, brother-in-law, grandparents (including step), and grandchildren (including step). Bereavement pay is a maximum of eight (8) hours per day.
- If additional time off is needed for the death of an immediate family member, the employee may use any available PTO, provided this additional time off has been approved by the employee's supervisor.

An employee's immediate supervisor must be notified of the need for bereavement leave prior to taking the leave. Employees need to contact FMLASource at 877-462-3652 to initiate a Bereavement Leave. FMLASource will walk the employee through the processing of this leave. The employee must submit proof of death, such as an obituary or death certificate.



## Jury Duty

All full-time and part-time employees who have completed the introductory period will be eligible for paid leave for jury duty or paid otherwise if required by state law.

Eligible employees are entitled to time off with pay for jury duty up to a maximum amount of time equal to two (2) work weeks. The actual number of hours will be determined by the standard hours worked by the employee in a work week. Any compensation received for jury service, except for any expenses reimbursed, must be endorsed and submitted to the company.

Employees who are in their probationary introductory period will be given appropriate time off but will not be eligible for jury duty pay.

Upon receipt of a summons, subpoena or other request to appear and serve jury duty, the employee must notify their supervisor and contact FMLASource at 877-462-3652 or at [www.fmlasource.com](http://www.fmlasource.com). FMLASource will walk the employee through the process. The employee will be required to present a copy of their summons, subpoena, or other documentation.

## Promotion and Transfers

Employees are promoted from within the company whenever possible. To be eligible for a promotion or transfer, a full-time or part-time employee must have no disciplinary action for the past six (6) months and meet the minimum qualifications of the position sought. In addition to these requirements noted, corporate employees must have been in their position for 6 months to be eligible for a transfer. To prepare for eligibility to advance in the company, you should perform your present job satisfactorily and take advantage of training and educational opportunities.







## Overtime

Non-exempt employees will receive time and a half for all overtime hours worked in accordance with state and federal laws. You must get prior written approval from your supervisor to work overtime, but must report the time, whether approved or not.

Unauthorized overtime, as well as working off the clock, will and must be paid, but will also result in disciplinary action, up to and including discharge.

From time to time it will be necessary to mandate that employees work overtime, and cooperation is appreciated.



## Employment And Wage Verification

Thomas & Company is authorized by Aegis Therapies to provide quick, safe and secure employment and wage verification. Information verification will only be used for purposes that are permissible under the Fair Credit Reporting Act. Your wage information will not be provided to a third party without your written authorization.

There are times when you may wish to provide a third party with verification of your employment or a record of your earnings, such as when you buy a car, apply for a loan, rent an apartment, or refinance a mortgage. Government agencies may also request for wage or employment information verifications. Requesters should be directed to use the website, **[www.Thomas-and-Company.com](http://www.Thomas-and-Company.com)**.

**Should the requester have any questions or need assistance, the Thomas and Company dedicated staff is available by phone during normal business hours by calling 615-620-0569 or emailing [Verifications@Thomas-and-Company.com](mailto:Verifications@Thomas-and-Company.com).**

## Safety In The Workplace

Our company is committed to promoting safety and providing a safe place for you to work. You must “think safety” at all times to minimize accidents and injuries to yourself and other employees and visitors. If you see something that is unsafe and could cause an accident, attempt to correct it, if possible, AND notify a supervisor immediately.

Observe the safety rules in every phase of your work and use proper lifting techniques.

If your job requires you to drive using your own vehicle while on company business, you must fasten your seat belt at all times. Employees are never to text while driving.

If an accident occurs at work, you **MUST** notify your supervisor of the accident immediately, no matter how minor it may seem to you. Failure to immediately notify your supervisor and file a report of the accident may jeopardize your work-related injury benefits and subject you to disciplinary action.

Individuals in a motor vehicle accident, Post-accident, employees may be tested for controlled substances and/or alcohol.

By accepting responsibility for your own welfare, as well as that of your fellow employees, you can prevent accidents.



## Visitors On Center Premises

To provide for the safety and security of all employees and patients at the work location, only authorized visitors are allowed in the workplace. In locations not owned/operated by Aegis Therapies, we will defer to the policies and procedures of our host locations. Where no other policy is in place, employees, and former employees, are not permitted on the property unless scheduled for work or with specific authorization.

Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee and patient welfare, and avoids potential distractions and disturbances.

Because of safety and security reasons, visitation at the work location by employee's family and friends is not permitted unless there is an emergency, or unless otherwise stated by a location's policies & procedures.

In case of emergency, you will be called to meet your visitor outside of the work area.

All visitors should enter the premises at the main entrance. Authorized visitors will receive directions or be escorted to their destinations. You are responsible for the conduct and safety of your visitors.

If an unauthorized visitor is observed on company premises, you should immediately notify your supervisor or, if necessary, direct the individual out of the building.

## Infection Control and Employee Health

It is your responsibility to be fully aware of the company's infection control policy and to follow infection control procedures to protect everyone involved.

You are required to provide complete, accurate and updated health information anytime your health changes and/or when a communicable disease could spread to others.





## Violence In The Workplace

It is the policy of our company to maintain a safe, healthy and productive workplace for all employees. Threats and violent acts threaten the quality of our work and the safety of our employees and customers.

### **We will not tolerate:**

- Threatening or violent behavior
- Verbal or physical abuse
- Verbal threats of physical violence
- Weapon use or possession on company property (even if you are licensed to carry a concealed weapon)
- Vandalism or arson
- Any other coercive act against person or property while on company property or on working time which management believes is inappropriate in the workplace
- Joking about, making light of, or making offensive comments regarding violent acts or situations.

Threats or acts of violence outside work, but related to your employment, may also be a violation of this policy.

We reserve the right, at all times, and without prior notice, to inspect any and all company property including desks and lockers, for the purpose of determining if this policy or any other company policy has been violated.

All vehicles and containers brought onto company property by employees are subject to inspection by a company representative in the presence of the employee at any time the company has a reasonable suspicion that this policy has been violated and that such an inspection is reasonably necessary in the investigation of such suspected violation.

No inspection of an employee's property will be conducted without the consent of the employee; however, failure to give consent to such inspection will be cause for disciplinary action, up to and including termination of employment.

## Drug and Alcohol-Free Workplace

It is the intent and obligation of the company to provide a drug-and alcohol-free, healthy, safe and secure workplace. You are expected and required to report to work on time and in an appropriate mental and physical condition for work.

In addition, the company will not tolerate the unlawful manufacture, distribution, dispensation, possession or use of a controlled substance or alcohol on company premises.



Violations of this policy will result in disciplinary action, up to and including termination of employment.

All applicants for employment will be tested for use of controlled substances once a conditional offer of employment has been extended.

Employees may be tested for controlled substances and/or alcohol under certain circumstances in accordance with company policy. This may include “post-accident (vehicle accidents),” “post-rehabilitation” and “reasonable suspicion” drug or alcohol testing.

Refusal to submit to testing will result in disciplinary action, up to and including termination of employment.

When an employee is using prescription or over-the-counter drugs, or other medicine that may affect their ability to safely and/or effectively perform their duties, the employee is required to advise the immediate supervisor before commencing work.

## **Solicitation and/or Distribution of Literature**

“Solicitation” is the act of urging, cajoling or persuading someone to accept a product or service for sale, a doctrine to follow, or an organization to join.

“Distribution of literature” is the handling or passing out (or any other means of transmittal) of any written material (such as advertising, fliers, handbills or enrollment material) to an individual that would aid in soliciting the individual.

Solicitation and/or distribution of literature by one employee to another employee is prohibited while either person is on working time or in immediate patient care areas. “Working time” is all time when your duties require that you be engaged in work tasks but does not include your own time, such as meal periods, scheduled break times, times before or after a shift, and personal cleanup times.

Solicitation, distribution of literature and trespassing by non-employees is prohibited on company premises.

Employees should not leave unattended non-work related materials in any area of the office or break rooms.

Employees are not permitted access to the interior of the work location or outside work areas during their off-duty hours, except for requested patient visitation. (See No Solicitation Poster.)



## Bulletin Boards

Bulletin boards are used by management to communicate information about equal employment opportunity, wage and hour laws, health and safety, company policies, business announcements and all other official communications that affect the company or your job.

Employees may not post, tape, tack or affix in any other way any literature, printed or written materials, photographs or personal notices on company bulletin boards, on the walls or elsewhere on company property.

Any posting that is not posted by management and/or that is not an official company communication will be removed. All postings must be approved and initialed by Management.

## Job Postings

All full-time and part-time openings will be posted electronically to give active employees first opportunity to apply. Job openings will be posted for a minimum of three (3) business days, to ensure all internal candidates are considered. Outside candidates may also be recruited simultaneously.

## Progressive Discipline and Discharge

We feel that it is very important for employees to know what is expected of them. We believe that employees should be made aware of the rules that are to be followed, and that these rules should be applied in a uniform and impartial manner to all employees.

**Important!** Employment is at the mutual consent of the employee and the company. Either can terminate the employment relationship at-will. No policy can contemplate all the reasons that would warrant discharge. Nothing in this section changes the at-will nature of your employment, neither does it guarantee any fixed terms and conditions of your employment.

Aegis Therapies believes that employees should be treated fairly and be informed about the policies that must be followed. Failure to adhere to company policies and to meet performance expectations subject employees to discipline, up to and including termination, in accordance with the disciplinary policy.

Company policies and handbooks are designed to protect the Company, its employees, and customers rather than to restrict the flow of useful, appropriate, or protected information.

Nothing in this, or any other policy, is intended to restrict activity protected by Federal or State law, including the National Labor Relations Act's protections concerning Section 7 rights and concerted activity.



## Personal Calls, Cell Phones and Cameras

Company telephones are for company business. Phone lines need to be available for business operations. Employees should not make or receive any personal calls during work time.

Employees must ensure that friends and family members are aware of the company policy. However, flexibility will be allowed for urgent personal matters.

Personal cell phones and electronic devices are only permitted in patient care areas for authorized business purposes and only in compliance with HIPAA.

Aegis Therapies' Cell Phone, Cameras and Texting in the Workplace policy, is in place for use of personal cellular phones for work purposes. This policy should be followed at all times. Personal cellular phones should not be used for personal business during work time. Employees should not make or receive any personal calls or texts during work time.

Use of cameras or audio recordings in the workplace, including camera phones, is prohibited unless being used for work-specific activities such as telehealth or approved special event or promotion activities. When using cameras, audio recordings or camera phones all required consent forms and approvals must be in place. Any questions regarding approved usage situations should be reviewed with your direct supervisor.

**Violation of this policy and/or excessive use of a phone for personal business will result in discipline, up to and including termination.**





## Computer Use, Tablet Use, E-mail, Voicemail and the Internet

The computer and telephone systems are important assets and have been installed to facilitate business communication. Although you may be able to use codes to restrict access to information left on the systems, it must be remembered that these systems are intended solely for business use. They are not private or confidential.

In keeping with this intention, we maintain the ability to access and monitor any information on the systems.

Because we reserve the right to obtain access to all voicemail and computer files, including e-mail, you should not assume that such messages are confidential or that access by the company or its designated representatives will not occur. Access to these systems may be conducted before, during or after working hours, and in the presence or absence of you.

You are asked to always receive prior authorization before changing any access codes that are available to you. In addition, you are prohibited from unauthorized use of access codes of other employees to gain access to voice mail or computer network systems.

## Leaving the Company

Upon resignation or notice of termination, employees forfeit their right to take PTO time off even if the time off had previously been requested and approved.

Employees leaving the company are required to provide appropriate written notice to the company based on the information noted below.

- All exempt managers, directors or VP employees are required to give four (4) week notice of resignation or downgrade from full time or part time.
- Exempt professional employees plus Aegis Therapists, Therapy Assistants and Rehab Aides, Wellness are required to give three (3) week notice of resignation or downgrade from full time or part time.
- Non-exempt employees in the Fort Smith or Plano office are required to give two (2) week notice of resignation or downgrade from full time or part time.

PTO, vacation and/or sick time off with pay balances will not be paid out upon voluntary or involuntary separation unless state requires otherwise despite this policy.

Prior to departing, you should return to your supervisor any keys, name badges, uniforms, back supports, credit cards, computers and other company property.

Final payment of wages and other compensation due will be made on the following regular payday, or in accordance with state regulations and company policy.

The immediate supervisor must consult with Human Resources about employee's request to rescind a resignation.





## What Happens to Benefits Eligibility and Continuation of Coverage?

When you terminate employment, your benefits will terminate at 11:59 p.m. on the date of termination. When you change to a non-benefit eligible status, your benefits will terminate at 11:59 p.m. on the date that the change was entered into the benefits system. Some benefits have continuation or conversion options. For information about your options to continue or convert coverage after termination or change to a non-benefit eligible status, refer to the Benefits Termination Brochure available on My Aegis Benefits on HR Online or call the Benefits Service Center at 855-207-1986. My Aegis Benefits on HR Online can be accessed via MyCare under the button “Benefit Plan Information.”

## OUR LEGAL RESPONSIBILITIES

All post-acute care providers, including skilled nursing facilities, hospice, therapy and long-term care companies, operate under a strict and complex set of federal, state and local laws and regulations for licensing and certification. These regulations govern the delivery of care to patients and a wide range of supporting functions including, but not limited to, documentation, records management, admissions, claims submission and ordering medical supplies.

## False Claims Act (FCA)

Aegis Therapies believes that the claims we submit for payment will be just and accurate when we follow our policies and procedures and use the systems we have in place. Our company has training to prevent improper billing, policies and procedures to prevent, detect and correct an incorrect claim, as well as audits in place to prevent the submission of an incorrect claim.

The federal False Claims Act prohibits knowingly submitting a false claim to a federal payer for reimbursement. A “false claim” could include:

- Making a false statement regarding a claim for payment
- Falsifying information in the medical record
- Double billing for items or services
- Billing for services not performed or finished
- Submitting claims that are related to other violations of laws or rules, such as the anti-kickback laws

The federal False Claims Act also has “whistle-blower” or “qui tam” provisions. These allow private persons to file lawsuits in the name of the government for violations of the Act. The government may or may not choose to act on the information brought forward. If it does not act, the individual has the right to pursue the action independent of the government. If an entity is found in violation of the Act, the individual who brought the action forward may be entitled to a percentage of the recovery.

If you have a concern regarding submission of a claim for payment, there are many options for bringing this to the attention of the company. The qui tam provisions of the False Claims Act do not require an individual to report concerns to the entity before they bring them forward in the name of the government. However, if you have a legitimate concern regarding submission of claims for payment, Aegis Therapies needs to know so we can review the information, investigate and clarify or correct the situation promptly and as appropriate.



## Deficit Reduction Act (DRA)

Under the Deficit Reduction Act of 2005, known as the DRA, Aegis Therapies must have written policies on both the federal FCA and any state laws that also prohibit the submission of false claims to state healthcare programs.

These policies also include protections from retaliation for any employee who reports potential wrongdoing under a federal or state false claim law. If you have any questions about the federal FCA, or about any similar state law provisions, contact the Legal Department.

## Abuse and Waste

“Abuse” refers to practices that are inconsistent with sound fiscal business or professional practices that result in increased costs to any governmental payment program. It may also mean reimbursement for services that are not included under applicable coverage guidelines or of excessive length or intensity. Program abuse can also occur when information is intentionally misrepresented to obtain payment.

“Waste” generally means the overuse of services from inadequate oversight, mismanagement or lack of internal controls that results in unnecessary costs to any governmental program. The distinction between fraud, waste and abuse depends on specific facts, the available evidence and the intent and prior knowledge of the parties. All questions about this complex area of the law should be referred to the Legal Department as soon as the question or issue becomes apparent to you.

## Kickbacks and Inducements

The federal Anti-Kickback Statute and various similar state laws prohibit giving, getting, offering or asking for anything of value in return for referrals. Company policies and procedures contain rules about business transactions, gifts, conflicts of interest, record keeping and documentation. You must examine all relationships and arrangements with referral sources, physicians, vendors and suppliers to be certain there are no kickbacks or illegal inducements for the referral of patients.

You should never accept gifts, favors, services, entertainment, money or other items of value that are intended to influence your decision-making judgment or actions.

You must never offer anything of value, aside from nominal and occasional promotional items, to influence a vendor’s or supplier’s decisions or pricing. Any questions should immediately be referred to the Legal Department for analysis.



## Legal Department

Our company will comply with all laws that apply to its business. The healthcare industry is subject to many laws and regulations that address business practices and the delivery of services. In some instances, these laws and regulations may be difficult to understand.

- When any question exists as to our company's legal rights and obligations, the Legal Department should be consulted for advice to ensure compliance with all applicable laws and regulations.
- The Legal Department should be consulted before an employee threatens to sue another company or individual on behalf of the company or initiates litigation of any kind.
- Our company's attorneys are the only employees who may seek or retain outside legal counsel for any purpose.
- The company's attorneys should be notified immediately when any notice of legal action against the company is received or when there is an unusual occurrence that could result in legal action against our company.

## Communicating and Cooperating with Regulators, Government Investigators or Contractors

The healthcare industry is subject to many laws and regulations that address business practices and the delivery of or payment for services. In some instances, these laws and regulations may be complicated and difficult to understand. If you have any questions, be sure to ask your supervisor or contact the Compliance Department or the Legal Department.

Aegis Therapies will cooperate with every reasonable request of federal, state and local authorities seeking information concerning our operations and related compliance matters. At the same time, our company is entitled to the safeguards provided by law, including the representation of legal counsel from the first contact. The company may be asked for patient information that is protected by privacy laws and may be obliged to ensure privacy in responding to such requests.

In the course of your work, you may receive inquiries from regulators or government authorities. You should respond that the company intends to cooperate but that the matter must first be discussed with the Legal Department. All such requests, written or oral, must be reported to an attorney in our Legal Department by telephone immediately. Our legal team will advise you of further action. The only exception is that surveyors conducting licensure and certification surveys should have access to all routine information, but if any question arises during a survey as to the propriety of the surveyor's requests for information, an attorney in our Legal Department should be contacted immediately to advise you.

When we are notified of an external investigation or lawsuit, we will take prompt action to preserve documents that may be relevant. You will be notified of any actions required of you to assist in this effort.



Questions regarding our company's legal rights and obligations should be taken to the appropriate attorney in our Legal Department for consultation and advice to ensure compliance with all applicable laws and regulations.

- Keep informed about changes in the law or new requirements that may affect your business unit.
- Always report inquiries from regulators immediately to your supervisor and the Legal Department whether the inquiry is made by telephone, mail or a personal visit. Never take it upon yourself to respond to any such inquiries or contacts.

You must never offer anything of value, aside from nominal and occasional promotional items, to influence a vendor's or supplier's decisions or pricing. Any questions should immediately be referred to the Legal Department for analysis.

## Our Responsibilities as Corporate Citizens

Forward all requests and responses or correspondence from your Medicare Administrative Contractor, Medicaid program, quality improvement organization and/or other Centers for Medicare and Medicaid Services (CMS) contractors to Records Management for triage and to obtain the support you need before responding.

## Supplier and Vendor Relations

Our suppliers and business partners make significant contributions to our success. To create an environment where our suppliers have an incentive to continue to work with Aegis Therapies, they must be confident that they will be treated lawfully and in an ethical manner.

Our policy is to purchase supplies and select suppliers based on need, quality, service, price, regulatory and legal, compliance, and terms and conditions. We select significant suppliers and contractors through a competitive bid process where possible. All supplier or business relationships are conducted by way of appropriate written contracts that are approved by the Legal Department.

## Supplier Diversity

We recognize the importance and benefits of a diverse supplier base. Supplier diversity is good for us, for our patients and for the community.

We will work to identify qualified minority and women-owned business enterprises capable of providing products and services. This effort aims to develop and maintain a strong supplier base that reflects the diversity of the overall supplier community. We always meet the company's needs for goods and services through competitive bidding and procurement procedures. The procurement process provides free and open competition that prevents any potential vendor from having a competitive advantage over others.

Do not give or accept any bribes, kickbacks, or other improper payments. Federal and state laws specifically make it a crime for anyone to offer or accept a bribe, kickback or anything of value for referring patients or other business.



## Conflicts of Interest

A conflict of interest happens whenever you have a competing interest that may interfere with your ability to make an objective decision for Aegis Therapies or our patients. For example, if you are involved in a business or other situation that might cause you to promote the interest of another — whether for your personal gain or for the gain of friends, relatives or business partners — then you may have a conflict of interest.

Each of us is expected to avoid situations that can lead to even the appearance of a conflict but if you find yourself in potential conflicts of interest and talk with your supervisor. Depending on the circumstances, some conflicts may be resolved if they are handled properly.

**It is impossible to describe every potential conflict, but the following are some examples:**

### Personal Financial Gain

If you learn about a business opportunity because of your job, it belongs to Aegis Therapies first. This means that you should not take that opportunity for yourself, a relative or similar person unless you get approval from company management and the Board of Directors.

### Outside Employment

Outside employment can create a conflict of interest in several different ways. For example: outside work, including self-employment, may interfere with your ability to fulfill your Aegis Therapies responsibilities, or there may be a risk that the outside employment leads to a disclosure of confidential information, or the activity could adversely affect Aegis Therapies' reputation, or you might be in a position to inappropriately gain financially from knowledge learned at Aegis Therapies.

Because of the potential for conflicts, permission to provide services to others similar to those you provide for Aegis Therapies should be obtained from your supervisor and must be approved by the Compliance Officer.

### Investment/Ownership Interests

Employees may not own, either directly or indirectly, a significant interest in any business that does or seeks to do business with, or is in competition with, Aegis Therapies without written approval from the Compliance Officer.

### Civic Activities

Unless company management specifically asks you to do so, you should not accept a seat on the board of directors or advisory board of any of our competitors, suppliers, patients' or partners' businesses, especially if your current job gives you the ability to influence our relationship with them. Positions with educational, charitable and other non-profit entities need not be disclosed unless the company has been asked in the last two years, or will be asked in the future, to contribute to such entity.



## Family Members

You should never hire or place relatives inside the company in positions that create a conflict of interest. The term “relative” includes an employee’s parent, child, spouse, significant other, sister, brother, or any person related by blood or marriage. Conflicts of interest are created when:

- You have direct supervisory authority over a relative
- You have bookkeeping or payroll responsibility over a relative
- You may significantly influence the pay, benefits, career progression or performance of a relative

Employees should not contract with relatives or incur any financial or personal obligation that might affect, or appear to affect, their judgment in dealing with other employees or with outside firms or individuals.

## Dating Relationships

You may not have a dating relationship with another employee:

- Who is in your reporting or supervisory chain
- For whom you have bookkeeping or payroll responsibility or vice-versa
- Whose terms or conditions of employment may be influenced by the relationship

Should you find yourself in a potential conflict of interest or in a situation that could be perceived as a violation of this standard, speak with your supervisor or your HR Business Partner. Depending on the circumstances, some conflicts may be resolved if they are handled properly.

Two steps necessary to help resolve a conflict include disclosing the conflict or perceived conflict and then removing yourself from participating in any decisions regarding the competing interest. This practice will ensure all interests are represented and promoted fairly.

Disclosures are made to the employee’s supervisor and on the Conflicts of Interest Compliance and Disclosure through Workday.

Employers must avoid any situation involving a conflict between their personal interests (including those of close family members) and the interests of the company.

- Avoid conflict of interest situations whenever possible.
- Always make business decisions in the best interest of our patients and Aegis Therapies.
- Discuss with your supervisor full details of any situation that could be perceived as a potential conflict of interest.
- Proactively address situations that may put your interests, or those of a relative or others, in potential conflict with Aegis Therapies.
- Circumstances can change and new conflicts can surface over time, which is why it is important to reassess your situation from time to time and discuss any potential conflicts with your supervisor.

Each employee should review his or her own activities, as well as those of any relatives upon hire, annually, and if their situation changes in a way that may be viewed as a potential conflict of interest, alert your supervisor so that the proper disclosures can be made.



## Gifts and Entertainment

Although gifts and entertainment are usual and customary in other businesses, in our business of healthcare, more stringent laws and policies apply. When our employees and business partners do not comply with these rules, their conduct can damage our reputation, harm our business and may even be illegal. While this area can be complicated, for us one principle is always clear: We do not give or accept gifts or entertainment to improperly influence a business decision.

No gifts — not even gifts of nominal value — can be accepted from or offered to anyone who refers or might refer patients or other reimbursable business to or from our company (including items whose costs impact reporting in any way to governmental entities).

More specifically, gifts are only to be given or accepted if ALL of the following conditions are met:

- The gift cannot be reasonably construed as payment or consideration for Influence or reward for a decision or action.
- It does not violate applicable law.
- If it was disclosed to the public, it wouldn't embarrass you or the company.
- It is of nominal value.
- It can be shared with other employees.

Accepting or giving occasional modest refreshments as part of an educational meeting, or giving promotional items such as logo pens or sticky pads, where not otherwise prohibited by law, may be appropriate when developing business relationships. However, they must only be modest and never be routine, lavish or contrary to Aegis Therapies policies.

### Rules for Vendors and Business Partners

Federal and state laws specifically make it a crime for anyone to offer or accept a bribe, kickback or anything of value for referring patients or other business. Employees must never give to, or receive from, any vendor or potential vendor any bribe, kickback or other unusual payment.

Never solicit money, contributions or program sponsorships, or other property or favors from vendors. If a supplier or vendor insists on sending gifts, it is best to suggest they make a donation to a suitable non-profit charity in the name of Aegis Therapies. Such a donation is in keeping with Aegis Therapies' mission.

Never offer or accept services or supplies for free or buy or sell them at less than fair market value as an inducement to obtain contracts or any other services.

### Rules for Gifts and Entertainment of Government Representatives

Extra care and caution needs to be taken when dealing with government officials. Federal and state lobbying and ethics laws regulate contacts with government officials and their staffs and employees. These laws subject our company and its employees to registration, reporting and other requirements.



No gifts or other benefits, including entertainment, can be offered to government officials that could be considered as influencing any business decision or to obtain improper advantage.

Any request made to a Aegis Therapies employee by a government official for an improper payment, or any action taken or threatened by such a government official with the intent of obtaining an improper payment, must be reported immediately to the Compliance Officer.

Aegis Therapies and its affiliated companies at all levels must report certain contacts between employees and Members of Congress and their staff or with employees of the federal government. If you have any such contacts or communications, notify your Compliance Liaison so that, if necessary, the information is appropriately disclosed.

### **Gifts and Loans from Patients and Their Family Members**

Patients, resident councils and families of patients sometimes wish to give gifts to show appreciation to employees for good service. These are well-intentioned gestures, but the acceptance of a gift could give the impression that you are favoring a patient or giving him or her special care. It could also give the impression that you are taking advantage of the patient.

Employees must never accept gifts or tips from patients, family members or others that compensate or reward an individual employee. Accepting modest gifts is permissible only if they are donated to the location or staff for fair distribution among all employees. This is an acceptable option only if no employee has solicited or encouraged such gifts.

All other gifts or offers of gifts should be refused with the explanation that acceptance would violate company policy.

- Only give or accept gifts and entertainment that are nominal in value and are reasonable complements to business relationships.
- Never provide or accept gifts or entertainment that obligate or appear to obligate the recipient.
- Neither accept nor offer gifts — not even gifts of nominal value — from or to anyone who refers or might refer patients or other reimbursable business to or from our company.
- Do not request or solicit personal gifts, favors, entertainment or services.
- Do not accept personal gifts or loans from patients or their families.
- Gifts of cash or cash equivalents are never allowed.
- Always report gifts and entertainment, as well as stipends and travel expenses, paid by a third party in your expense report. Be sure to state the purpose for the entry accurately.
- Never aid or abet a third party in giving or receiving inappropriate gifts or entertainment.





## Insider Trading

In the course of business or in conversations with patients or business partners we may hear information about publicly traded companies. It's important to know that we are prohibited from trading securities or passing information on to others (tipping) who then trade on the basis of material information before it is made publicly available to ordinary investors.

- Do not buy or sell securities of any company on the basis of material non-public information.
- Be careful when others request confidential information about our business partners. Even casual conversations could be viewed as illegal “tipping” of inside information.

## Fair Dealing and Antitrust

Never engage in improper practices that may limit competition through illegal and unfair means. Most violations of antitrust laws arise from contacts with competitors. We do not enter into agreements with competitors to engage in any anticompetitive behavior.

Antitrust laws are very complex and the risks associated with noncompliance can be severe. If prices are discussed with a competitor, that action alone may be considered a violation of antitrust laws. As a general rule, contacts with competitors should be limited and must always avoid certain subjects including any matter relating to competition between Aegis Therapies and its competitors, such as fees charged, profit margins and billing practices.

- Never participate in conversations with competitors that could be perceived as limiting competition. Avoid “loose talk,” informal discussions, or exchange between competitors of information from which common pricing or other collusion could result. Such discussions, no matter how innocent they may seem at the time, may later be subject to antitrust scrutiny from the government.
- Be familiar with the following practices and understand that they may constitute antitrust violations:
  - o **Price fixing** - Agreement among competitors to raise, lower or stabilize prices. No employee may have any discussion with a competitor in which price information is shared, whether directly or indirectly.
  - o **Division of markets** - Agreement among competitors to allocate trade territories.
  - o **Group boycott and refusal to deal** - Agreement among competitors to refuse to deal with certain customers or other competitors.
  - o **Tie-in** - The sale of one product or service on the condition that the buyer must purchase a separate product or service, if the seller has a substantial share of the market for either product or service.
  - o **Favoritism** - Treating similarly situated customers differently or otherwise showing favoritism in sales or purchasing practices.



## Political Involvement

Aegis Therapies believes in the right of employees to participate in the political process. Employees are encouraged to be politically active as individual citizens on their own time and at their own expense in their communities.

There are times when Aegis Therapies will distribute advocacy campaigns sharing Aegis' view on specific political issues and legislation. In these circumstances, employees are authorized, should they choose to participate, to engage in the company-led advocacy via company devices and share Aegis' publicly distributed messages such as social media messages or blog posts.

When participating personally in the political process employees must always make it clear that their views and actions are their own and not those of the company. Employees must never use company funds, assets, services or facilities to support any political candidate or party unless specifically permitted by law and authorized through the Communications Department.

Aegis Therapies and its affiliated companies at all levels must report certain contacts between employees and Members of Congress and their staff or with employees of the federal government. If you have any such contacts or communications, please notify your Compliance Liaison so that, if necessary, the information is appropriately disclosed.

- Take steps to ensure that your individual political opinions and activities are separate and distinct from those of Aegis Therapies.
- Before committing Aegis Therapies to any corporate political spending or use of company resources, you must obtain prior approval through the Communications Department.
- Do not use company assets, services, facilities and resources (including telephones, computers, and fax/ copy machines) for political purposes.
- Never pressure another employee, patient, patient's family member or business partner to contribute to, support or oppose any political candidate or party.
- Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties.
- Do not solicit contributions or distribute political literature during work hours.
- Never make a political or charitable contribution with the intent to improperly influence someone.

## Marketing Practices

Our company's competitive appeal must be based on the quality and value of our services and the employment opportunities and benefits we offer, and must never be based on questionable marketing or recruiting practices. Our reputation for integrity, quality services and fair employment practices is an asset we must work hard to protect.



## Information About Our Competitors

Information about competitors is a valuable asset in today's business environment. When collecting business intelligence, employees and others who are working on our behalf must always abide by the highest ethical standards.

Never engage in fraud, misrepresentation or deception to obtain information or use invasive technology to spy on others. Be careful when accepting information from third parties, know and trust their sources and be sure that the knowledge they provide is not protected by trade secret laws or nondisclosure or confidentiality agreements.

While Aegis Therapies hires former employees of competitors, we recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers.

- Ensure that our advertising is truthful. No employee shall label or market our company's services in any way that may intentionally cause confusion between the company's services and those of any of its competitors.
- Obtain approval from the Compliance Officer in advance of any arrangement that involves compensation for referring privately funded business.
- Never speak negatively about the facilities, services or employees of any of our competitors. Comparative advertising must not be conducted, unless the Legal Department has approved the advertising copy in advance.
- Use the company's trademarks, trade names and service marks in accordance with the policy governing their use.
- Do not give gifts of greater than nominal value, excessive entertainment, improper bonuses, finder fees or anything else with the intention of improperly influencing our patients, potential patients or employees.
- At all times market our company's healthcare business — and recruit employees — solely on the basis of our price, benefits, quality and services.

## Accurate, Fair and Honest Representations (Consumer Protection)

All sales and marketing activities and communications must be professional in nature and facilitate the exchange of relevant information that will benefit patient care and services. It is appropriate and valuable to increase awareness of our services, quality and outcomes to the patients and referral sources we serve and to educate the community at large on issues of interest to our target populations.

To accomplish this objective, you must provide only accurate and objective informational materials that identify the clinical and business value of the services we provide. Aegis Therapies employees should avoid actions that could create the perception of impropriety and must avoid any inflated claims, disparagement of competitors or other deceptive marketing communications.



All marketing materials must be prepared by the Marketing Department and receive approval from the Legal and Compliance Departments before use in our markets.

## Communicating with the Public

We need a clear and consistent voice when providing information to the public and the media. For this reason, it is important that only authorized employees speak on behalf of the company. Never give the impression that you are speaking on behalf of Aegis Therapies in any communication that may become public if you are not authorized to do so.

Requests for information from any member of the press must be referred immediately to the Aegis Therapies Communications Department by calling 972-372-6766.

- If you receive a media inquiry regarding Aegis Therapies' activities, results, plans or its position on public issues and are not specifically authorized to respond, do not answer the reporter's questions. Instead, refer the request to the Communications Department, and tell the reporter that a company representative will return his or her call.
- If you intend to write or publish a book, article or manuscript or deliver a presentation that relates in any way to our business, you must receive prior approval from your supervisor and the Legal Department. If the publication or presentation identifies you as an employee, it must state that: "The views expressed in this article/presentation are mine and Aegis Therapies does not subscribe to the substance, veracity or truthfulness of the views expressed."

## Using Social Media

At Aegis Therapies, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities.

Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates or otherwise adversely affects members, customers, suppliers, people who work on behalf of Aegis Therapies or the company's legitimate business interests may result in disciplinary action up to and including termination.

Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Always be fair and courteous to fellow employees, patients, customers, suppliers or people who work on behalf of the company. Also, keep in mind that you are more likely to resolve work related complaints by speaking directly with your co-workers or by utilizing our Open Door Policy than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious,



obscene, threatening or intimidating, that disparage patients, customers, employees, or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone’s reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about the company, fellow employees, patients, customers, suppliers, people working on behalf of the company or competitors.

Maintain the confidentiality of Aegis Therapies trade secrets and private or confidential information including healthcare information. Trades secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business- related confidential communications. Express only your personal opinions. Never represent yourself as a spokesperson for the company. If you do publish a blog or post online related to the work you do or subjects associated with Aegis Therapies, make it clear that you are not speaking on behalf of the company. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of Aegis Therapies.”

The company’s logos, trademarks, and copyrighted materials may not be used in any manner unless specifically authorized by the company. Employees may not post pictures or videos of patients or residents unless specifically authorized by the company to do so and have obtained written authorization from the patients or residents.



# Summary

The information presented in this handbook is a brief overview of personnel policies, guidelines and operating principles established to help you in your job. Employees have access to all policies and procedures via myCare by going to the “Workspace” page, clicking on the “Learn” tab, and selecting “Policy Center.” Employees are required to be familiar with and follow all company policies and procedures. Ignorance of company policies and procedures is not an allowable excuse for not being held accountable for them. If you have any questions not answered by this handbook, be sure to ask your supervisor. We want to help you succeed in your job, as well as make your work pleasant and productive.

If you have any suggestions for improvement in your company, please pass them along to your supervisor.

You must acknowledge that you have received a copy of the handbook and understand the information by completing the online employee acknowledgment through Workday. You should plan to complete your acknowledgment within Workday no later than 30 days from when you receive the handbook or no later than 30 days from your general orientation as a new hire or rehire employee.

To complete the online acknowledgment, login to Workday. By electronically signing this form, you are Acknowledging that:

- You have read and understand the Code.
- You have had the opportunity to ask questions regarding the contents of the handbook and understand how the contents relate to your position with the company.
- You agree to inform a supervisor within five (5) days if you receive a notice of exclusion or are convicted of a crime.
- You agree to abide by the principles of the handbook
- You agree to keep this handbook for future reference.

**For assistance with policy questions or for instructions on Workday, contact your supervisor or HR Business Partner.**

## Contact

877-877-9889  
2601 Network Blvd., Ste. 102  
Frisco, TX 75034  
AegisTherapies.com

