

HESSCO Code of Conduct

OUR PRINCIPLES

HESSCO's Board of Directors, Advisory Councils and Staff share certain values that shape the way we conduct ourselves every day. We strive to embrace values that are compassionate, innovative and performance minded. Our principles are based on building relationships with those values and with the basis of our practices rooted in honest, fair and morally responsible actions. Integrity is the critical behavior we strive to achieve. Our consumers and stakeholders have come to expect that HESSCO Employees will emulate these qualities, always working in the best interest of our agency and consumers. We work to fulfill our mission by working to help people live more fulfilling and healthier lives in their homes if that is where they choose to be and by supporting caregivers so they can support their loved ones.

HESSCO's Code of Conduct, a blueprint to the principles we strive to present every day, are rooted in integrity and ethics.

What We Believe

HESSCO's mission is to design and implement a comprehensive, continuous, consumer-focused quality management system that supports individuals, older adults, and persons with disabilities to live in communities first. Personal and institutional integrity is essential to the ongoing success of our work. Our commitment to integrity will encourage consumers, business partners and others to trust us and work closely with us.

How We Behave

We make honest commitments and consistently honor those commitments. We tell the truth. We have the courage to acknowledge mistakes or errors in judgment and do whatever is needed to address them. We never compromise our ethics and integrity. We will be known for living up to the highest standards of ethical behavior. Our consumers trust that we will always do our best for them and act with compassion and integrity at all times.

OUR COMMITMENT

HESSCO is committed to managing an individual's personal information respectfully, responsibly and in accordance with all applicable laws. We strive to build trust individual-by-individual, serve our business objectives, and foster enduring relationships with our stakeholders.

As such, we are entrusted with consumers' private health and identifying information. Such information is of a confidential nature and may not be discussed except as it is necessary to the accomplishment of agency work. HESSCO employees must work to safeguard confidential information and only access, store and disclose information when authorized or mandated by

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law. Employees must respect the rights of consumers to privacy and confidentiality at all times, as well as their right to self-determination unless legally deemed unable to make decisions for themselves.

Complying with the Code of Conduct

This Code is designed to give employees full and fair notice of their professional and ethical obligations. HESSCO cannot address every situation that arises and so we rely on our employees' good judgment to address situations.

- Every employee is expected to maintain and uphold the integrity of HESSCO.
- Employees shall comply with all HESSCO policies and operating procedures including those of the department in which they work. Employees shall respond forthrightly and promptly to the work-related directives of their supervisors.
- Employees are expected to conduct themselves in their official relations with consumers and community partners, and with their fellow employees, in a manner which will enhance respect for, and confidence in, the employee and HESSCO as a whole.
- Every employee must scrupulously avoid any actual conduct which constitutes a conflict of interest or conduct which gives the reasonable basis for the impression of a conflict of interest between their private interest and their work for HESSCO.
- Every employee is prohibited from either taking some action, or failing to perform some duty, which would personally benefit them or give preferential treatment to any person or entity. This would include accessing information or providing services to a consumer with whom you have a family or personal relationship, or that is outside of your role or responsibility.
- Employees shall comply with all laws, program instructions, and agency policies and procedures; these directives will be followed to ensure equitable and consistent service and behaviors. Standard practices and procedures are maintained and updated regularly based on changes to the laws of the Commonwealth and regulatory requirements of our business partners. Employees are required to be aware of these directives and will receive regular training on mandated subjects and internal policies to ensure familiarity. New employees will receive training upon hire.
- If an employee is unsure of a policy or procedure or what to do in any situation that may arise, a supervisor or manager will be available to assist in managing the event.
- If you see, hear, or are otherwise aware of a violation with any laws, procedures, or this Code of Conduct, it is the employees' responsibility to speak up and report the violation

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or potential for violation. There will never be any retaliation for reporting and all reports will be investigated.

- Violations of this Code of Conduct, HESSCO's policies and procedures, and any applicable state laws or instructions will not be tolerated and will be subject to disciplinary action up to and including termination, including re-training. Unethical or illegal activities can never be justified and may compromise HESSCO's reputation.

When faced with a potential ethical issue, it may help to ask these questions:

- Could this harm the reputation of the agency?
- Am I certain my actions are legal?
- Am I being fair and honest?
- How will my actions appear with the benefit of hindsight?
- How will the situation be described in a newspaper headline?
- Will I sleep soundly tonight?
- What would I counsel a coworker to do?

When in doubt—say something! It's important to speak up if you see something that may be non-compliant. Non-compliance means that something is being done that is not in accordance with this code, policies, State or Federal laws or regulations. There will never be any retaliation for raising a concern.

ACT WITH INTEGRITY

Recognize and address conflicts of interest.

Conflicts can occur when you or your immediate family member's personal, financial, social or political interests or activities, or investments could affect or appear to affect your decision-making on behalf of the agency, or where your objectivity could be questioned because of these interests or activities. Every employee must avoid any actual conduct which constitutes a conflict of interest or conduct which gives the reasonable basis for the impression of a conflict of interest between their private interest and their work for HESSCO.

HESSCO Employees should not accept gifts from consumers or providers of more than a token value.

No employee of this agency may accept gifts (other than small items such as edibles), money, or favored treatment from any consumers or any provider of services to the agency, subcontractor,

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or sub-grantee. No employee may solicit such gifts, money, or favored treatment from any consumer, provider agency, subcontractor, or sub-grantee that may be construed as a payment for that employee's intervention on behalf of the third party with the agency's business.

Giving or receiving gifts or entertainment (“business courtesies”), such as tickets to an event, a meal, or an invitation to a conference, may be inappropriate, and in some cases illegal. Talk to your supervisor when in doubt.

Do not use agency property, information or your position for personal gain.

Each of us has a duty to advance the agency’s interests when an opportunity is presented. You may not use agency property, information or your position with the agency to take advantage of opportunities for your personal gain.

HESSCO records must have integrity.

HESSCO is committed to the integrity of its records, including documentation regarding consumers, books and financial reporting. Employees are responsible for ensuring that all books, documentation, records, and accounting are accurate and complete and properly reflect the actual transaction or event recorded.

We are all accountable for complying with laws, program instructions, policies and procedures and this code of conduct.

It is the responsibility of everyone to report breaches or non-compliance promptly and to acknowledge mistakes so that we may address them. Reports to managers will be addressed within two business days and management will maintain confidentiality to the greatest extent possible while conducting the review. It is expected that the employee who reported the incident will cooperate in any investigation. Retaliation for reporting any suspected breach or instance of non-compliance is against HESSCO policy as is reporting false claims. Disciplinary action may be taken for these offenses.

HESSCO’s Compliance Officer is the HESSCO Executive Director and the Compliance Committee is comprised of the Senior Management Team. Oversight of all compliance with this code of conduct and all laws, program instructions, and HESSCO’s policies and procedures are monitored regularly. Management of all internal investigations will be reviewed to ensure compliance with the standards. The Management Team review will ensure a complete and thorough investigative cycle has been completed.

Accountability

The agency's assets are critical to HESSCO’s continued success, and each employee must ensure that the assets used in his or her role are protected from misuse, loss, improper disclosure and

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destruction. HESSCO's assets are intended to be used for business purposes that benefit the agency and our consumers. Employees working in the HESSCO office may have access to information that may be considered protected information because of normal working operations such as shared workspace and shared technology such as printing machines and telephones. Employees should take appropriate steps to ensure this access is limited by using headphones for phone calls, retrieving printed documents timely, and securing files and other information when in shared space. Those who gain access to information inadvertently, either within the organization or outside it, have a responsibility to protect the confidentiality of consumer and business information, and to take action to stop the further dissemination of confidential information.

HESSCO is also committed to preserving the environment. We encourage employees to conserve natural resources and implement green strategies and environmentally conscious practices in the workplace.

Social media has become an increasingly important communication tool, but it also presents an arena for potential communications pitfalls. Employees who publish or post content on blogs, social networking sites, wikis and other user-generated media on the internet (such as Facebook, Google, LinkedIn, Yahoo/Groups, YouTube, Twitter, Wikipedia, Pinterest, chat rooms, message boards, etc.) must exercise good judgment and adhere to the HESSCO Standard Policy and Procedure for Social Media Use.

In reference to speaking with the media e.g. reporters, journalists, etc.:

Refer members of the media to the Executive Director or a member of the Senior Management Team. This will ensure that the person or organization seeking information receives the most current and accurate information.

In reference to speaking at a conference or professional group:

If you are asked to speak at a conference or in a professional group do not speak on behalf of the agency unless you are authorized to do so by your manager. Be careful to identify agency views and keep separate from your own personal opinions.

Respect

HESSCO promotes a safe and respectful work environment with appreciation for our differences and acknowledges the value of diversity to our organization. HESSCO will not tolerate behavior that endangers its employees, consumers, or stakeholders or subjects them to discrimination, harassment, or threats.

We will provide an environment free from acts or threats of violence, and from illegal drugs and alcohol misuse. We do not retaliate against individuals who make good-faith complaints or

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reports of discrimination, harassment, violence or threats, or any other Code violation, or who provide information related to any such complaint or report. The agency will balance employee privacy with the need to maintain a safe and efficient work environment. This Code of Conduct represents a broad overview of the expectations for all employees of the company. For more detailed procedures, HESSCO maintains policies to ensure the above statements reflect our work environment.

Safe and Healthy Work Environment

HESSCO recognizes that there will be a continuous need to maintain a safe and healthy work environment. Towards that end, employees will abide by principles, strategies and guidance provided by HESSCO and other regulatory agencies.

Who to Contact with Questions or Concerns

- Contact your direct supervisor with any questions or concerns. You may also contact their supervisor if they are not available.
- Report any concern or suspected violation to the HESSCO Executive Director or one of the Senior Managers.
- If you would prefer to file an anonymous report of a suspected violation, HESSCO maintains an electronic version of the Report of Suspected Non-Compliance form in the Public cloud folder under Staff Trainings→All Staff Trainings→Code of Conduct. This template can be completed without disclosure of the filer's personal information. The form is also an attachment to this document. The form should be mailed to:

Mary Jean McDermott
c/o HESSCO Elder Services
545 South Street
Walpole, MA 02081

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Largely taken by permission from the UnitedHealth Group – Code of Conducts Our Principles of Ethics and Integrity

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