

Code of Conduct

This shortened-version of the Code of Conduct is derived from Kintura's full-version Code of Conduct, which outlines a set of standards that articulate the organization's philosophy, summarizes basic legal principles, and teaches employees how to respond to practices that may violate the Code of Conduct. Below are the general principles that are similarly applicable to all employees to guide the operations of Kintura in order to promote organization-wide integrity.

Standard – Compliance with Laws & Regulations

Kintura will strive to ensure all activity by or on behalf of the organization is in compliance with applicable laws, including, but not limited to, those addressing fraud, waste, abuse, discrimination, and the workplace environment.

Standard – Care Excellence

Kintura is committed to delivering high quality of care and our priority is the health and safety of our residents and employees. Abuse and neglect are never tolerated. Kintura will also strive to maintain the confidentiality of residents and other confidential information in accordance with applicable laws.

Standard – Professional Excellence

Kintura is an equal opportunity employer which strives to only employ and contract with persons/entities with proper credentials and experience. This standard includes conducting various screenings in accordance with applicable laws, including exclusion list screening. Kintura is also committed to fostering a working environment free from discrimination, intimidation, and harassment.

Standard – Financial Excellence

All employees will strive to preserve and protect Kintura's assets by making prudent and effective use of the organization's resources by properly and accurately reporting its financial condition. Employees or agents who perform billing and/or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with federal and state laws and regulations and Kintura's policies.

Standard – Business Relationships

Kintura strives to comply with the Anti-Kickback Statute and Stark laws. Employees will not seek or accept remuneration of any kind from residents, their families/friends, or vendors. Kintura's employees and agents will not pursue any business opportunity that requires engaging in unethical or illegal activity.

Standard – Business Ethics

In furtherance of Kintura's commitment to the highest standards of business ethics and integrity, employees will accurately and honestly represent Kintura, including on social media.

Standard – Conflicts of Interest

Officers, committee members and key employees owe a duty of undivided and unqualified loyalty consistent with applicable state and federal laws to the organization. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization.

The complete Code of Conduct is posted on our company website at: <u>https://www.Kintura.org/Code-Conduct/</u>

If you suspect a violation of KINTURA's Code of Conduct, or have a compliance concern, please report it:

■: (800)-206-8035

 <u>compliance@Kintura.org</u>

 Kintura, Attn: Compliance Director

 2109 Sandy Ridge Rd, Colfax, NC 27235