

BUSINESS ETHICS AND CORPORATE COMPLIANCE

100: POLICY

SYNERGY HOME CARE METRO NEW JERSEY aspires to the highest ethics, compliance with laws, regulations and service standards in relation to business operations and practices and direct service to customers

Therefore, it is the policy of SYNERGY HOME CARE METRO NEW JERSEY to assure compliance with all laws, regulations, and accreditation standards to help maintain operations in an ethical manner. The Governing Authority has final judgment on all business ethics and compliance decisions. All employees are to conduct themselves in a principled manner and in compliance with laws, regulations, and accreditation standards, this includes providing proof of certification or licensure. Failure to do so may result in disciplinary action. A Code of Ethics is provided each employee, which includes the assignment to the appropriate level of care, excluding employees from performing personal care. Annual reports to the Governing Authority on incidents of misconduct or violations are prepared and evaluated. This policy statement will be distributed to the general public and referral sources annually. Reports of misconduct, safety concerns or violation can be made by anyone within the prescribed procedure, including licensing and/or regulatory agencies, the Compliance Officer and are held in confidence. SYNERGY HOME CARE METRO NEW JERSEY will cooperate with all reasonable and lawful demands made by government investigators or law enforcement agents and no documents will be altered or destroyed in anticipation of a request by a lawful investigation.

PROCEDURE:

- 1. It is the determined policy of SYNERGY HOME CARE METRO NEW JERSEY and its employees to adhere to sound and lawful business practices and comply with all laws, regulations, accreditation standards and guidelines. Therefore, a Business Ethics and Compliance Plan (BEC) has been established for employee conduct and delineates the consequences for failure to adhere to the accepted ethics and compliance practices within SYNERGY HOME CARE METRO NEW JERSEY.**
- 2. Components of the plan include the elements involved in plan oversight, monitoring and evaluation, distribution of the plan to employees and clients, reporting procedures, and establish the approach to outside investigations as well as the provision for enforcement of the plan.**

3. New employees will be informed of the BEC Plan during orientation. Documentation will be placed in their personnel record.
4. The business ethics and compliance statement will be distributed to the community annually and to all clients at admission.
5. The Governing Authority will review the BEC plan and its findings annually through the reports made by the appropriate Committee.
6. The Governing Authority shall appoint an independent Compliance Officers and charge the Professional Advisory Committee with advising the Governing Authority on compliance and ethical issues and overseeing the SYNERGY HOME CARE METRO NEW JERSEY compliance program.
7. All reports of misconduct or violations of law are to be considered serious and are to receive immediate attention with a full investigation. Reports of any misconduct, unethical business practice or violation of laws and accreditation standards and guidelines can be made by anyone. The occurrence must be reported in writing to the Chief Executive or Compliance Officer and include the name of the accused person(s), act(s), and date(s) of the suspected violation. The Chief Executive will meet with the staff member(s) making a report of misconduct or violation of the law as the first step in the investigation process. All reported incidents are investigated within five (5) days of the report, including those reported by the Compliance Officer.
8. Employees will be protected under the CEPA Law (Conscientious Employee Protection Act). Which means SYNERGY HOME CARE METRO NEW JERSEY prohibits taking any retaliatory action against any employee because the employee in good faith discloses or threatens to disclose violations of law, unethical, or fraudulent acts.
9. The Governing Authority shall annually review. all reported violations or incidents of misconduct and compliance, the findings of all internal audits to include admissions, reimbursement, accounts receivable, delinquent accounts, and staff expenses. The Governing Authority shall have final judgment on all business ethics and compliance decisions.
10. SYNERGY HOME CARE METRO NEW JERSEY has adopted a Code of Ethics that clearly outlines expected conduct and is displayed in office.
11. Failure by any employee to report unethical or unlawful practices or actions is

misconduct warranting disciplinary action. However, any employee who raises a complaint under this policy in bad faith, or for the purpose of harassing another employee, or who repeatedly raises meritless complaints hereunder, will be subject to disciplinary action, and such disciplinary action will not be deemed retaliation under this policy.

12. The SYNERGY HOME CARE METRO NEW JERSEY and its employees will cooperate

with all reasonable and lawful demands made by finding agencies, governmental investigation or law enforcement agents. Written, copied or electronic documentation is not to be altered or destroyed in anticipation of a request or as a result of a request *for* those documents by any authorized lawful investigation.

FRAUD

106: POLICY:

SYNERGY HOME CARE METRO NEW JERSEY goal is to establish and maintain a business environment of fairness, ethics and honesty for its employees, customers, and anyone else with whom we have a relationship and to prevent fraud, financial loss, damaged reputation and litigation. To maintain such an environment requires the active assistance of every employee and manager every day.

Therefore, it is the policy of SYNERGY HOME CARE METRO NEW JERSEY to deter, detect and correct misconduct and dishonesty. In concert with federal and state mandates SYNERGY HOME CARE METRO NEW JERSEY shall adhere to whistleblower rights and protection. The discovery, reporting and documentation of fraudulent or illegal acts provides a sound foundation for the protection of innocent parties, the taking of disciplinary action against offenders up to and including dismissal where appropriate, the referral to law enforcement agencies when warranted by the facts, and the recovery of assets by any and all lawful means.

PROCEDURES:

1. For purposes of this policy, misconduct and dishonesty include but are not limited to:

theft or other misappropriation of assets, including assets of SYNERGY HOME CARE METRO NEW JERSEY, our customers, suppliers or others with whom we have a business relationship

- misstatements and other irregularities in SYNERGY HOME CARE METRO NEW JERSEY records, including the intentional misstatement of the results of operations wrongdoing
- forgery or other alteration of documents fraud and other unlawful acts
- any similar acts

The SYNERGY HOME CARE METRO NEW JERSEY specifically prohibits these and any other illegal and inappropriate activities in the actions of its employees, managers, executives, directors and all others responsible for carrying out SYNERGY HOME CARE METRO NEW JERSEY's activities.

2. It is the responsibility of every employee, supervisor, manager and executive to immediately report suspected misconduct or dishonesty to the Chief Executive. Managers, when made aware of such potential acts by subordinates, must immediately report such acts to the Chief Executive. Any reprisal against any employee or other reporting individual because that individual, in good faith, reported a violation is strictly forbidden

3. Due to the important, yet sensitive nature of the suspected violations, effective professional follow up is critical. Managers should not in any circumstances perform any investigative or other follow up steps on their own. Concerned but uninformed managers represent one of the greatest threats to proper incident handling. All relevant matters, including suspected but unproved matters, should be referred immediately to those with follow up responsibility.

4. Employees with supervisory and review responsibilities at any level have additional deterrence and detection duties. Specifically, personnel with supervisory or review authority have three additional responsibilities.

- First, you must become aware of what can go wrong in your area of authority. Second, you must put into place and maintain effective monitoring, review and control procedures that will prevent acts of wrongdoing. Third, you must put into place and maintain effective monitoring, review and control procedures that will detect acts of wrongdoing promptly should prevention efforts fail.

Authority to carry out these three additional responsibilities is often delegated to subordinates. However, accountability for their effectiveness cannot be delegated and will remain with the managers.

5. Investigations when warranted will have:

- free and unrestricted access to all records
- the authority to examine, copy and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities (whether in electronic or other form) without the prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of investigative or related follow up procedures

All investigations of alleged wrongdoing will be conducted in accordance with applicable laws and SYNERGY HOME CARE METRO NEW JERSEY procedures.

6. Care must be taken in the follow up of suspected misconduct and dishonesty to avoid acting on incorrect or unsupported accusations, to avoid alerting suspected individuals that follow up and investigation is underway, and to avoid making statements, which could adversely affect the SYNERGY HOME CARE METRO NEW JERSEY, an employee, or other parties. Accordingly, the general procedures for follow up and investigation of reported incidents are as follows:

Employees and others must immediately report all factual details to the Chief Executive. All records related to the reported incident will be retained wherever they reside. Do not communicate with the suspected individuals or SYNERGY HOME CARE METRO NEW JERSEYs about the matter under investigation. Neither the existence nor the results of investigations or other follow up activity will be disclosed or discussed with anyone other than those persons who have a legitimate need to know in order to perform their duties and responsibilities effectively. All inquiries from an attorney or any other contacts from outside of the SYNERGY HOME CARE METRO NEW JERSEY, including those from law enforcement agencies or from the employee under investigation, should be referred to the Chief Executive.

7. Investigative or other follow up activity will be carried out without regard to the suspected individual's position, level or relationship with the SYNERGY HOME CARE METRO NEW JERSEY.