

LEEWAY, INC

CODE OF CONDUCT

1. Preamble

The Code of Conduct (Code) for Leeway, Inc applies to all of us, whether we are a board member, employee, consultant, student, intern, or volunteer. Our Code reflects a commitment to our values and provides a framework to guide ethical conduct in a way that upholds the integrity and reputation of Leeway. We are expected to behave in a way that aligns with this Code. We understand that this Code does not cover every specific scenario. Therefore, we use the spirit and intent behind this Code to guide our conduct and exercise care and diligence in the course of our work with Leeway.

To demonstrate commitment to transparency and accountability, this Code is available to the public on Leeway's website: www.leeway.net

2. Mission Statement

Leeway, Inc, an integral part of the continuum of AIDS care, is committed to being a center of excellence in providing inpatient rehabilitative and palliative care and creating new community services so that those with AIDS can live as independently as possible. This expert care is respectfully provided with compassion and without regard to race, national origin, religion, handicap, gender, or sexual orientation with a focus on the integration of body, mind, and spirit. We are committed to promoting quality of life and dignity to all those with HIV/AIDS.

3. Core Values

Investment in teamwork

Commitment to continuous quality improvement

Accountability to those we serve and to each other

Responsiveness to the spectrum of needs presented by those with HIV/AIDS

Excellence in the provision of HIV/AIDS care

4. Guiding Principles

These principles guide our behavior and decisions:

- a. Our actions and decisions are made to promote the public interest and to advance the mission and long-term interest of Leeway and those we serve. We will monitor our actions with the assistance of our compliance officer.
- b. We are responsible stewards of public resources.
- c. To serve the public interest, we have a responsibility to uphold Leeway's mission as detailed in our policies and procedures..
- d. We have a responsibility to act in good faith and to place Leeway's interest above our own private interests. Ongoing training and education furthers understanding of these responsibilities..
- e. We behave in a way that demonstrates that our behavior and actions are fair and reasonable .
- f. We enjoy the same rights in our private dealings as any other American, unless it is demonstrated that a restriction is necessary in the public interest.
- g. When we, as individuals, are subject to more than one code of conduct, we must consider the expectations in all. We understand that this Code is not intended to conflict with other Codes of Conduct, and will discuss any potential conflicts with our supervisor or the Code Administrator, using established, effective lines of communication.
- h. The Code applies to all of us unless a specific exemption is granted by the Code Administrator.
- i. We know that when we become aware of a real or perceived conflict of interest, we must, at the first opportunity, disclose this conflict to our supervisor or the Code Administrator.
- j. We understand that disclosure itself does not remove a conflict of interest.
- k. We expect our colleagues to act fairly and ethically and know that we are able to raise concerns about a suspected breach by another to our supervisor or the Code Administrator without fear of reprisal. We will respond promptly to detected offences and develop corrective actions through internal monitoring and auditing
- l. We know that breaches of this Code may result in disciplinary action, up to and including removal for those who are members, students, or volunteers, or termination for those who are employees.
- m. We know that if we have any questions about the Code , or are not sure how to apply these principles, we should consult with our supervisor or the Code Administrator
- n. As part of our annual review, each of us confirms annually our understanding of, and commitment to, the Code's expectations.
- o. We will accurately represent ourselves in our respected position within the limitations of our education, job description and/or licensure

5. Behavioral standards

Behavioral standards help us make appropriate decisions when the issues we face involve ethical considerations. Leeway's employee handbook outlines many of these expectations, which apply to all of us.

- a. We will not engage in any criminal activity.
- b. We will abide by all relevant laws, regulations, policies and procedures governing the care of nursing home residents and those who care for them.
- c. We will maintain high ethical standards in our business relationships with residents, families, contractors, government entities, and others. We will conduct business dealings in a manner that assures Leeway will be the beneficiary of these dealings. We will not use our status at Leeway as a means to gain an advantage for ourselves, our families, or any others with whom we have a personal or business relationship.
- d. Our actions create a safe and healthy workplace free from discrimination, harassment, inappropriate or condescending language, verbal abuse, and violence. All are welcome at Leeway, free to provide or receive care in a safe a supportive environment.
- e. We commit to a drug and alcohol free environment and will promote a smoke free environment as well.
- f. We will accurately represent ourselves and our responsibilities, and function within the limits of our education, job descriptions and licensure.