

TITLE	Code of Conduct Policy	CREATED	6/2009
Department	Corporate Compliance	Updated	3/2025

Policy Statement:

CWI is committed to conducting its business ethically and in conformance with all federal and state laws, rules and regulations and the agency's own Code of Conduct. To support this commitment, CWI will maintain and update as appropriate a written Code of Conduct to provide guidance on employee and organizational responsibilities related to compliance; and to provide employees, board members, and agents with guidance on requirements for conduct related to employment or engagement by CWI.

CWI's Code of Conduct addresses specific issues related to reimbursement, financial relationships, quality of care, and other critical areas and describes important parts of the compliance program including the problem resolution process, employee hotline, and non-retaliation policy.

All required parties will be provided a copy of the Code of Conduct and participate in annual training that includes a review of its provisions.

Procedures:

1. The Compliance Officer is responsible for the development and periodic review and, if necessary, update of CWI's Code of Conduct.
2. The Corporate Compliance (QA/CC) Committee and the Board of Directors are responsible for oversight and final approval of the Code of Conduct.
3. The Code of Conduct will be written and maintained at a basic reading level, avoiding complex language and legal terminology. At a minimum, it will address critical areas such as compliance with laws and regulations, human resource practices, quality of care and service, conflicts of interest, proprietary rights, confidentiality, safety, and reimbursement practices. The Code of Conduct will address specific areas of potential fraud or similar wrongdoing (e.g., claims development, submission processes, diagnostic/procedural code selections) and address major issues identified by the Federal Sentencing Guidelines and the Office of Inspector General (OIG).
4. The Code of Conduct will address human resources related compliance issues such as sexual harassment, workplace bullying and discrimination, as well as CWI's commitment to quality of care and service.
5. The Code of Conduct will be provided to all new employees as part of the new employee orientation. All recipients will sign and date a receipt that acknowledges: (a) receiving a copy of the Code of Conduct, (b) reading

and understanding the contents, and (c) agreeing to abide by its provisions.

6. The Compliance Officer will ensure that all required parties receive training annually that addresses various relevant topics contained in the Code of Conduct and helps them understand how it applies to everyday work situations. The HR Director or designee will ensure that records are maintained to document the receipt of training.
7. The Compliance Officer will ensure that each new Board member is provided with a copy of the Corporate Compliance Plan and the Code of Conduct.
8. The CFO or designee will ensure that all independent contractors are provided with a copy of the Code of Conduct upon entering into a contractual agreement with CWI.
9. The Compliance Officer will report to the QA/CC Committee and Board of Directors on the status of training, along with any needed recommendations for updating or improving the contents of the Code of Conduct.
10. The Compliance Officer and Director of Human Resources or designee are responsible for ensuring that possible violations of the Code of Conduct are investigated and disciplinary action has been taken when necessary.
11. Confidentiality and non-retaliation policies will be referenced and included as part of the Code of Conduct for the purpose of encouraging communication and the reporting of incidents of suspected fraud or other wrongdoing.
12. The Code of Conduct will include instructions to report fraud, abuse, suspected violations of the Code of Conduct, or other suspected wrongdoing directly to the Compliance Officer or other supervisory personnel.

13. The Code of Conduct will provide guidance on how employees and agents may report suspected violations of federal or state laws, rules and regulations or the Code of Conduct without fear of retribution or retaliation to an organization hotline or other mechanism that bypasses management.
14. The Code of Conduct will include a description of disciplinary mechanisms utilized by CWI and the procedures for addressing disciplinary actions.