

Policy Subject: Corporate Compliance Policy	Policy Number: HR 1.0.5
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Andrus seeks to conduct itself in accordance with the highest level of business and community ethics and in compliance with all applicable laws and regulations. Andrus is committed to preventing, detecting and correcting any unintentional or deliberate conduct that is inconsistent with these principles. More detailed information on Andrus's compliance program and procedures can be found in Andrus Corporate Compliance Plan.

Policy Subject: Conflict Of Interest Policy	Policy Number: HR 1.0.6
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A conflict of interest occurs when an employee's interests or those of an outside party actually or potentially affect the Agency in a negative way.

- **Outside Business Interests.** Under certain circumstances it may be permissible for an employee to engage in employment outside of Andrus, as long as it does not interfere with the employee's job performance at Andrus or present a conflict of interest. Employees must notify their supervisor and receive approval if they are currently engaged in or plan to become involved in any outside employment. If the Agency, in its sole discretion, determines that a conflict of interest exists, the outside employment or private practice will not be approved and must immediately cease. Failure to disclose outside positions or to comply with this policy may result in disciplinary action, up to and including termination.

Employees may not earn profit from outside employment or business interests which directly result from affiliation with Andrus. No Andrus employee may engage in employment or private practice with a child or a member of the child's immediate family while the child is in placement at Andrus and for twelve (12) months thereafter without the approval of the CEO. In situations where a child or member of the child's family wishes to engage a former Andrus employee, and where a clinical need exists, this may be considered on a case-by case basis and with the review and approval of the Agency's President and CEO.

- **Gifts, Gratuities.** Any giving or accepting of goods or services in the course of Andrus business must comply with ethical principles to maintain propriety and transparency in all of our relationships. At no time should the offering or accepting of gifts reflect any potential for special treatment or personal gain. The following guidelines, while not exhaustive, outline expectations for minimizing potential conflicts of interest.

Personal gifts from clients. Under no circumstance may a staff member accept a gift of money from a client and must tell the client that money may not be accepted. Any personal gifts valued at more than \$50 may not be accepted and staff are required to tell the donor that Agency policy forbids employees from accepting such a gift. Employees are asked to use good judgment in accepting or refusing gifts and to report the offer and receipt of all gifts to their supervisors.

If, within these guidelines, the staff member is offered and accepts or redirects a gift, the client's case record should include an entry documenting the nature of the gift and the resolution.

The client may be redirected to making a general gift to a program or team of staff such as a special treat, a piece of equipment or an activity. Again, a supervisor should be consulted on

the appropriate action. The Development Office is always a resource to clients who wish to make gifts of funds or services to benefit the Agency or its services.

Personal Gifts of Goods or Services from Vendors. When a vendor gives a gift of goods or services to any person in a position to direct contracts, if the value of any gift exceeds \$100, or if several gifts are received throughout the year, and the aggregate annual value of all gifts exceeds \$100, the item(s) must be returned with an explanation. Gifts must be shared with staff, where appropriate. When a gift is received from a vendor, the staff member receiving the gift must report a description of the gift and the disposition to the Executive Assistant, as a list of gifts is kept in the Executive Office for accountability purposes.

Vendors frequently offer sports or entertainment tickets or invite staff to be guests at special events. Generally these offers are made to Department Heads who may accept if it seems that it will advance business purposes and not obligate the organization to the vendor. When possible, these offers must be shared with staff. As with gifts of goods, these offers must be reported to the Executive Office for accountability purposes.

- **Personal Beliefs.** Andrus recognizes that its employees may hold a wide range of personal beliefs, values and commitments. These beliefs, values and commitments are a conflict of interest only when they prevent employees from fulfilling their job responsibilities, or if employees use the Agency's time and facilities for furthering these beliefs. If an employee attempts to impose these beliefs on others they will be asked to stop and potentially subject to disciplinary action, up to and including termination.
- When a staff member finds that his or her personal values, ethics or religious beliefs may be in conflict with an expectation of the job, such as facilitation of a medical procedure, participation in holiday observation with children or families, or a requirement to work during the staff member's religious observation time, the staff member is required to raise the issue with the immediate supervisor who will coordinate an effort to reach a reasonable accommodation which respects the staff member's values, ethics or beliefs. If the supervisor and staff member cannot reach a reasonable accommodation, the staff member may pursue the matter with the Department Head. If still dissatisfied, the staff member may make a written appeal to the Human Resources department, and may ultimately petition the Executive Vice President, then the President and CEO in a formal grievance.
- **Fraternization.** Andrus prohibits employees from fraternizing with any of the people served by our programs. If evidence of non-professional, non-work-related interaction between any employee(s) and any person(s) served is found, including the transferring of money or goods between employees and persons currently or formerly served by Andrus, the President and CEO or designee will conduct an investigation of the charges to determine if a policy violation has occurred. If a violation is established, the employee(s) may be subject to disciplinary action, up to and including termination. Additionally, a report will be filed with the appropriate authorities if applicable.

Involvement by Andrus staff with persons formerly served by the Agency must be professional and ethical in accordance with the following guidelines:

1. The former client must have received no services from the Agency for at least one year.

2. Staff must discuss possible relationships with the employee's Department Head, who will, in turn, notify the President and CEO prior to involvement so that any concerns may be addressed as they arise.
- **Off-Duty Activities.** Employees of Andrus may not engage in any activity, communication or other conversation (verbally, in print, or on the internet—even if password protected), on or off duty, that can be traced back to Andrus and that reflects negatively on the standard of care that we provide. Specifically, any behaviors, engaged in by an employee who is identified as an Andrus employee that a reasonable person would construe as indicating the employee may not be safely entrusted with the care of children may be considered grounds for termination.

Use of Andrus Name for Non-Approved Purposes. Employees may identify themselves as employees of Andrus only for approved business purposes; in financial or legal transactions where the name of the employer is required; or in transactions connected to employee benefits. Employees may not identify Andrus as their employer in any public forum (i.e. social networking sites, etc.) without the express written consent of the CEO or designee.

Policy Subject: Whistleblower Policy-General Reporting Responsibilities	Policy Number: HR 2.1.0
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Andrus requires all of its directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Any director, officer or employee must report any violations of these high standards. Matters which should be reported under this policy include, but are not limited to, suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of our assets or suspected regulatory, compliance, or ethics-related issues, concerns or violations.

Policy Subject: No Retaliation Policy	Policy Number: HR 2.1.1
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No director, officer or employee who, in good faith, reports a violation shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith will be subject to disciplinary action, up to and including termination.

Policy Subject: Reporting Violations Policy	Policy Number: HR 2.1.2
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Questions, concerns, suggestions and complaints regarding the ethical and legal standards noted above should be reported either internally or through the externally maintained compliance hotline. Internal lines of reporting for employees include the normal chain of supervision, members of the Compliance Committee, the Director of Quality Assurance & Compliance, or the Compliance Officer where possible. Employees also have the option of making an anonymous report through the externally maintained compliance hotline. The toll-free hotline staff wishing to report incidents of misconduct or impropriety can call anonymously is: (877) 825-7788 or they can e-mail concerns to JDAMCompliance@pmallp.org.

Policy Subject: Acting in Good Faith Policy	Policy Number: HR 2.1.3
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Anyone filing a complaint concerning a violation or suspected violation of the ethical and legal standards noted above must act in good faith and have reasonable grounds for believing the information disclosed may indicate a violation of such standards. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Policy Subject: Investigation of Reports Policy	Policy Number: HR 2.1.4
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The Compliance Officer, acting in cooperation with the Compliance Committee and Director of Quality Assurance & Compliance, is responsible for investigating and resolving all reported complaints and allegations concerning the ethical and legal standards noted above and shall advise the Executive Director and the Board of Directors of all such complaints and allegations. The Compliance Officer is required to report to the full Board of Directors at least annually on compliance activity.

Policy Subject: Confidentiality Policy	Policy Number: HR 2.1.5
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Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.