

**VAN BUREN COMMUNITY MENTAL HEALTH AUTHORITY  
CORPORATE COMPLIANCE  
CODE OF CONDUCT**

Van Buren Community Mental Health Authority has adopted a Corporate Compliance Program to ensure that the agency operates in full compliance with applicable laws. An important component of the program is a Code Of Conduct, setting forth out basic principle, which all of Van Buren Community Mental Health Authority and Van Buren Community Mental Health Authority's providers, directors, officers, and employees (referred to as "personnel") must follow. The Code of Conduct describes the standards applicable to all facets of Van Buren Community Mental Health Authority operations. Specific procedures operationalizing the Code of Conduct appears in the Corporate Compliance Plan, which applies to all personnel. Non personnel representatives of Van Buren Community Mental Health Authority, such as sales agents and consultants, should also be directed to conduct themselves in a manner consistent with this Code of Conduct when they are acting on behalf of Van Buren Community Mental Health Authority. If you have any questions about the Code of Conduct or its applicability to a particular situation, please contact your supervisor or the Corporate Compliance Officer.

**STANDARDS OF CONDUCT**

1. Integrity – One of Van Buren Community Mental Health's strongest assets is a reputation for integrity and honesty. A fundamental principle on which Van Buren Community Mental Health operates its business is full compliance with applicable laws. Van Buren Community Mental Health will also conduct its business in conformance with sound ethical standards. All personnel shall act in compliance with the requirements of applicable laws and this Code of Conduct in a sound ethical manner when conducting business and operations
2. Honesty – Personnel shall be completely honest in all dealings with government agencies and representatives and commercial insurance carriers. No misrepresentations shall be made, and no false bills or request for payment or other documents shall be submitted to government agencies or representatives or commercial insurance carriers. Personnel certifying the correctness of records submitted to government agencies and commercial insurance carriers, including invoices or requests for payment, shall have knowledge that the information is accurate and complete before giving such certification.
3. Leadership – Each supervisor and manager is responsible for ensuring that the personnel under her/his supervision are acting ethically and in compliance with applicable laws and the Code of Conduct. All personnel are responsible for acquiring sufficient knowledge to recognize potential compliance issues applicable to their duties and for appropriately seeking advise regarding such issues.
4. Bribes – Personnel shall not offer, give, or accept any bribe, payment, gift, or thing of value to any person or entity with whom Van Buren Community Mental Health has or is seeking any business or regulatory relationship except for gifts of nominal value which are legal and given in the ordinary course of business. Personnel must

promptly report the offering or receipt of gifts above nominal value to their supervisor and the Corporate Compliance Officer.

5. Political Influence – Personnel shall not directly or indirectly authorize, pay, promise, deliver, or solicit any payment, gratuity, or favor for the purpose of influencing any political official or government employee in the discharge of that person's responsibilities.
6. Political Activities - All political activities relating to Van Buren Community Mental Health Authority shall be conducted in full compliance with applicable law. No Van Buren Community Mental Health Authority funds or property shall be used for any political contribution or purpose unless first approved by the CEO. Personnel may make direct contributions of their own money to political candidates and activities, but these contributions will not be reimbursed.
7. Conflict of Interest – Other than compensation from Van Buren Community Mental Health Authority personnel shall not have a financial or other personal interest in a transaction between Van Buren Community Mental Health Authority or any of its business units, a vendor, supplier, provider, or consumer.
8. Duty of Loyalty and non Interference – Personnel shall not engage in any financial business, or other activity which competes with Van Buren Community Mental Health Authority's business which may interfere or appear to interfere with the performance of their duties or that involve the use of Van Buren Community Mental Health Authority property, facilities, or resources, except to the extent consistent with the conflict of interest statement.
9. Accuracy – All of Van Buren Community Mental Health Authority's business transactions shall be carried out in accordance with management's general or specific directives. All of the books and records shall be kept in accordance with generally accepted accounting principles or other applicable standards. All transactions, payments, receipts, accounts, and assets shall be completely and accurately recorded on Van Buren Community Mental Health Authority's books and records on a consistent basis. No payment shall be approved or made with the intentional understanding that it will be used for any purpose other than that described in the supporting documentation for the payment. All information recorded and submitted to other persons must not be used to mislead those who receive the information or conceal anything that is improper.
10. Record Management – Books and records shall be created, maintained, retained, and destroyed in accordance with Van Buren Community Mental Health Authority's records management procedure.
11. Antitrust law – Personnel shall comply with applicable antitrust laws. There shall be no discussion or agreements with competitors regarding price or other terms for services, prices paid or supplier or providers, dividing up consumers or geographic markets, or joint action to boycott or coerce certain consumers, suppliers, or providers.
12. Unfair Competition - Van Buren Community Mental Health Authority and its personnel shall not engage in unfair competition or deceptive trade practices,

including misrepresentation of Van Buren Community Mental Health Authority's products or operation. Personnel shall not make false or disparaging statements about competitors or their products or attempt to coerce suppliers or providers into purchasing products or services.

13. Confidentiality – All personnel shall maintain the confidentiality of Van Buren Community Mental Health Authority's business information and of information relating to Van Buren Community Mental Health Authority's vendors, suppliers, providers, customers, and consumers. Personnel shall not use any such confidential or proprietary information except as is appropriate for Van Buren Community Mental Health Authority business. Personnel shall not seek to improperly obtain or misuse confidential information of Van Buren Community Mental Health Authority's competitors.
14. The standards of conduct shall be distributed to all employees.

### **REPORTING OF VIOLATIONS**

1. Illegal acts or improper conduct may subject Van Buren Community Mental Health Authority to severe civil and criminal penalties, including large fines and being barred from certain types of business. It is, therefore, very important that any illegal activities or violations of the Code of Conduct be promptly brought to Van Buren CMHA's attention. In any case, if Van Buren Community Mental Health Authority discovers and reports illegal acts to the appropriate governmental authorities, Van Buren Community Mental Health Authority may be subject to lesser penalties.
2. Any director, officer, or employee who believes or becomes aware of any violation of this Code of Conduct or any illegal activity by a director, officer, or employee or another person acting on Van Buren Community Mental Health Authority's behalf shall promptly report the violation or illegal activity in person, by phone, or in writing, to one of the following persons:
  - Corporate Compliance Officer
  - Chief Operating Officer
  - Chief Executive Officer
3. It is a violation of this Code of Conduct for personnel not to report a violation of the Code of Conduct or any illegal activity. If you have a question about whether particular acts or conduct may be illegal or violate the Code of Conduct, you should contact the Corporate Compliance Officer. It is a violation of this Code of Conduct for personnel to whom a potential illegal act or violation of the Code of Conduct is reported to not ensure that the illegal act or violation of the Code of Conduct comes to the attention of those responsible for investigating such reports.

If the illegal act or conduct that is in violation of the Code of Conduct involves a person to whom such illegal acts or violations might otherwise be reported, the illegal acts or violations should be reported to another person to whom reporting is appropriate.

4. All reports of illegal activity or violations of this Code of Conduct will be investigated promptly and thoroughly. Personnel must cooperate with these investigations. All

personnel must not take any actions to prevent, hinder, or delay discovery and full investigation of illegal acts or violations of this Code of Conduct. It is a violation of this Code of Conduct for personnel to prevent, hinder, or delay discovery and full investigation of illegal acts or violations of this Code of Conduct.

5. Personnel may report illegal acts or a violation of the Code of Conduct anonymously. To the extent permitted by law, Van Buren Community Mental Health Authority will take reasonable precautions to maintain the confidentiality of those individuals who report illegal activity or violations of this Code of Conduct and of any individual involved in the alleged improper activity, whether or not it turns out that improper acts occurred. Failure to abide by this confidentiality obligation is a violation of this Code of Conduct.
6. No reprisals or disciplinary action will be taken or permitted against personnel for good faith reporting of, or cooperating in the investigation of, illegal acts or violations of this Code of Conduct. It is a violation of this Code of Conduct for personnel to punish or conduct reprisals in regard to personnel who have made a good faith report of, or cooperated in the investigation of, illegal acts or violations of this Code of Conduct.
7. Personnel who violate the Code of Conduct or commit illegal acts are subject to discipline up to and including dismissal. Personnel who report their own illegal acts or improper conduct, however, will have such self-reporting taken into account in determining the appropriate disciplinary action.

#### **GOVERNMENT INTERVIEWS OR INVESTIGATIONS**

1. Van Buren Community Mental Health Authority and its personnel shall cooperate fully and promptly with appropriate government investigations into possible civil and criminal violations of the law. It is important, however, that in this process Van Buren Community Mental Health Authority is able to protect the legal rights of the agency and its personnel. To accomplish these objectives, any governmental inquiries or requests for information, documents, or interviews should be promptly referred to the Corporate Compliance Officer.
2. Personnel who participate in governmental interviews shall give answers that are truthful, complete, and unambiguous.