

SOUTHERNTIERCONNECT

Code of Conduct

Mission and Vision

From Otsego to Fulton, Herkimer to Broome, we know our region and each unique community within it. We take pride in building dynamic personal relationships that connect people with intellectual and developmental disabilities to the highest quality services in the Southern Tier. Each partnership empowers each person we serve to realize their potential and lead the healthiest life possible. As New York State's CCO of choice, Southern Tier Connect fosters dynamic and beneficial relationships between individuals with intellectual and developmental disabilities and the Southern Tier's leading service providers. Through the use of creative technology we collect and analyze relevant data and proactively respond to emerging trends, ensuring the success of our clients, partner providers, and organization. Our commitment to fiscal responsibility delivers value and offers countless opportunities to improve lives. Southern Tier Connect is the region's unparalleled model for care coordination.

Intent

Southern Tier Connect's Code of Conduct (the Code) applies to all employees, board members, volunteers and independent contractors.

The Code of Conduct was approved by Southern Tier Connect's Board of Directors and is a formal statement of the Agency's commitment to the standards and rules of ethical conduct.

Southern Tier Connect is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline employees who violate the Code, including employees who neglect to report a violation.

All employees must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

While these standards addressed in the Code of Conduct are intended to guide employees in the course of their day-to-day responsibilities, they do not replace any Southern Tier Connect or program policies and procedures. There may be instances that are not addressed by the Code of Conduct or existing policies and procedures, or activities that may conflict with these standards. Employees must seek direction from their supervisor, other Agency management staff or the Compliance Officer in these instances.

Ethics

It is the policy of Southern Tier Connect to observe all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all employees and contractors must obey the laws and regulations that govern their work and always act in the best interest of the people we serve, their families and the Agency.

SOUTHERNTIERCONNECT

Guidelines

- You are expected to keep management staff informed of what you are doing; to document or record all services or transactions accurately; and to be honest and forthcoming with Southern Tier Connect, regulatory agencies, and internal and external auditors.
- You are expected to comply with Southern Tier Connect's policies and procedures, accounting rules, and internal controls.
- You are expected to function with honesty in your work for Southern Tier Connect and with people we serve, providers, suppliers and all others with whom Southern Tier Connect does business.

Conflict of Interest

Employees and contractors must not allow any outside financial interest, or competing personal interest to influence their decisions or actions taken on behalf of Southern Tier Connect. Employees and contractors must avoid any situation where a conflict of interest exists or might appear between their personal interests and those of Southern Tier Connect. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

Guidelines

It is a conflict of interest for you to personally take for yourself opportunities that are discovered through the use of Southern Tier Connect property, information or position with Southern Tier Connect; to use Southern Tier Connect property or information for personal gain; or to compete with the Agency. There are many types of situations where potential conflicts may arise. You must promptly report any actual or potential conflicts of interest to your immediate supervisor or directly to the Compliance Officer.

Outside Activities and Employment

- You may not conduct outside activities during work time. Such activities interfere with your regular duties and negatively impact the quality of your work.
- You are a representative of Southern Tier Connect in your every day life and must represent Southern Tier Connect positively in the community.
- Outside employment must not conflict in any way with your responsibilities to Southern Tier Connect or the people we serve.

SOUTHERNTIERCONNECT

Use of Agency Funds and Resources

- Southern Tier Connect's assets are to only be used for the benefit of Southern Tier Connect and the people we support. Assets include funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about people served, financial information, computer property rights, and other business information about the Agency.
- You may not use Southern Tier Connect's assets for personal gain or give them to any other persons or entities, except in the ordinary course of business as part of an approved transaction.

Confidentiality

- During your employment, you may acquire confidential information about Southern Tier Connect, its staff and people we support that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and supported individual information is very important.

Business Dealings Between Southern Tier Connect and Employees

- Southern Tier Connect will not be inappropriately influenced with goods or services from any business in which you or your immediate family members have a substantial interest.
- Property and resources of Southern Tier Connect should only be used for the benefit of the Agency or the people we serve.

Maintenance of Records

Employees and contractors must record and report all agency, individual and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the people we support, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims payment records, correspondence, and any other method of communication. Employees or contractors must not omit or conceal any relevant information.

Guidelines

Many of Southern Tier Connect's forms are legal documents used to prove that a service was provided, to bill for a service to a supported individual, to record a job task, or to record specific happenings. You must document accurately and honestly, and only for those services that you provided or those events you were involved in.

SOUTHERNTIERCONNECT

Falsification of Records

- You must not make any false entries in any of Southern Tier Connect's records or in any public record for any reason.
- You may not alter any permanent entries in Southern Tier Connect's records.
- You may only approve payments or receipts on behalf of Southern Tier Connect that are described in documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on the agency books, are strictly prohibited.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.

Expense Records

- You must always charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project, or contract, or the budget status of a particular account or line item.

Retention of Records

- The retention, disposal, or destruction of records of or pertaining to Southern Tier Connect must always comply with legal and regulatory requirements and Southern Tier Connect policy.
- You may not destroy records pertaining to litigation or government investigations or audit without express written approval of the Compliance Officer.

Protection of Confidential Information

Southern Tier Connect has developed policies and procedures to assure that the confidentiality of Southern Tier Connect information and information about the people we serve is protected and released only with the appropriate authorization or for lawful reasons, in addition to purposes of treatment, payment, and operations. All employees and contractors are required to comply with Southern Tier Connect's Confidentiality HIPAA Compliance. If you have any questions concerning confidential information or the Confidentiality HIPAA Compliance, contact your immediate supervisor or the Compliance Officer.

Guidelines

You must treat all Southern Tier Connect records and information as confidential.

You may not release confidential information without the proper authorization. Confidential information

SOUTHERNTIERCONNECT

includes not only information about the people that we serve and their families, but also non-public information about Southern Tier Connect that may be of use to Southern Tier Connect's competitors or harmful to Southern Tier Connect or the individual's served if released.

You must protect Southern Tier Connect information and avoid discussing or disclosing Agency information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Agency. Furthermore, staff may not share confidential Agency information with anyone, except where required for a legitimate business purpose.

Southern Tier Connect information may not be removed from Agency property without permission from a supervisor or administrator with proper authority over the information. Ask your supervisor if you are not sure whether certain information is confidential.

Termination of Employment

- You may not use any confidential information gained from your employment with Southern Tier Connect for your or another company's benefit. You may not take copies of any reports, documents, or any other property belonging to Southern Tier Connect.
- Upon termination of employment with Southern Tier Connect, you must return all Agency property including, but not limited to, copies of documents, notes, and other records containing confidential information; computers, USB drives, disks; Agency ID; keys and credit cards.

Information Security

- You are responsible for properly using information stored and produced by all of Southern Tier Connect's computer systems.
- Computers, Internet access, email, or other office communications systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing, or harmful to others.
- Do not share your system user name or password with another person or allow another to access the computer with your password.
- All employees and contractors are required to comply with Southern Tier Connect's E-Mail and Internet Use Policy. If you have any questions concerning information security, contact your immediate supervisor or Compliance Officer.

Fair Dealing

Conducting business with providers, contractors, suppliers, people we serve, and competitors may pose ethical

SOUTHERNTIERCONNECT

problems. Employees and contractors are expected to deal fairly with providers, contractors, people we serve, and competitors.

The Code of Conduct and the following guidelines are intended to help you make appropriate, responsible and correct decisions in these and all matters:

Kickbacks and Rebate

- Kickbacks and rebates in cash, credit, or other forms are prohibited. They are not only unethical, but in many cases, illegal.

Gifts and Gratuities and Entertainment

- You may not solicit money, gifts, gratuities, or any other personal benefits or favors of any kind from providers, contractors, producers, accounts, or people we serve and their families.
- You must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.

Agreements With Contractors and Vendors

Southern Tier Connect must assure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards, and the applicable compensation, if any, must be reasonable in amount, not be excessive in terms of industry practice and must equal the value of the services rendered.

Improper Use of Funds or Assets

Use of Southern Tier Connect's funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor or the Compliance Officer.

Federal and State Programs

Southern Tier Connect is committed to complying with the laws and regulations that govern the federal and state programs that it administers. Policies and procedures, the Compliance Program, and this Code of Conduct are developed to provide guidance in your day-to-day work. You must abide by the policies and procedures and the standards set by Southern Tier Connect.

Governmental Investigations

There may be times that Southern Tier Connect is asked to cooperate with an investigation by a federal or state governmental agency, or to respond to a request for information. A request may be

SOUTHERNTIERCONNECT

formally addressed to Southern Tier Connect or an individual within the Agency. Employees and contractors must report any requests for information or cooperation with an investigation to the Executive Director immediately.

Political Activities and Contributions

Because Southern Tier Connect intends to be a non-profit organization, it is prohibited from engaging in any political campaign activities and a “substantial” amount of lobbying.

Guidelines

Southern Tier Connect funds and resources, including your work time, may not be used for political contributions or activities.

You may not act as a representative of Southern Tier Connect in any political campaign activity. In expressing your personal political views or support or opposition of a candidate for public office, it must be very clear that you are expressing your personal view, support, or opposition as an individual and not a representative of Southern Tier Connect.

Laws and regulations prohibit a “substantial” amount of lobbying. There are allowances for the Agency to advocate its position on public issues. To assure that Southern Tier Connect does not violate any laws or regulations, or risk losing its tax-exempt status, you must seek prior approval from the Executive Director before engaging in any lobbying activities. The Agency may need to consult with legal counsel on the matter and will need to record the amount of time spent in lobbying activities.

Employment Environment

Southern Tier Connect is committed to creating a safe and professional workplace where employees and others are treated with respect and without regard to their race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics. Business integrity, teamwork, trust, and respect are Southern Tier Connect’s most important values. Unlawful discrimination or harassment of any sort violates these values. All Southern Tier Connect employees must exhibit and promote respect, integrity, trust, and teamwork in the workplace and must comply with this policy prohibiting discrimination and harassment in all facets of Southern Tier Connect’s work.

Guidelines

All employees are required to support Southern Tier Connect’s commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace.

All employees are prohibited from joking about another employee’s race, color, religion, creed, sex, age, national origin or citizenship, marital status, sexual orientation, military or veteran status, handicap/disability, genetic predisposition, carrier status or any other protected status or characteristic.

SOUTHERNTIERCONNECT

All employees are prohibited from considering someone's race, color, religion, creed, sex, age, national origin or citizenship, marital status, sexual orientation, military or veteran status, handicap/disability, genetic predisposition, carrier status or any other protected status or characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits and other work terms.

Sexual harassment is prohibited. Sexual harassment includes any form of unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual or sex-based nature.

You are responsible for understanding Southern Tier Connect's policy prohibiting discrimination and sexual harassment. You should consult with an appropriate supervisor or administrator if you have questions about your right to a workplace free from unlawful harassment or discrimination or if you have questions about your duty to avoid discrimination.

Seeking Guidance and Reporting Violations

Employees and contractors must report any actual or suspected violations of this Code of Conduct, any applicable law or regulation, or any Southern Tier Connect policy and procedure to their immediate supervisor or the Compliance Officer. A Compliance Hotline is also available for confidential or anonymous reporting of such issues. The Compliance Hotline number is (607) 376-7526 ext. 199.

When an actual or suspected violation of this Code of Conduct, any applicable law or regulation, or any Southern Tier Connect policy and procedure is reported to any Agency employee, it must be promptly referred to the Compliance Officer. Steps will be taken to protect confidentiality and anonymity, when appropriate and warranted. Southern Tier Connect will not tolerate any form of retaliation, intimidation or retribution against a person who makes a good-faith report in accordance with this Code of Conduct.

All employees and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Conduct, any applicable law or regulation, or Agency policy, procedure, or practice.

Corrective Action and/or Discipline

Any employee or contractor who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, or Southern Tier Connect policy, procedure, or practice is subject to appropriate disciplinary action, up to and including termination.

Disciplinary action may range from a warning to suspension or discharge, depending upon the nature of the incident and the relevant surrounding circumstances.

Your Responsibilities

- Attend required training and read and understand Southern Tier Connect's Corporate Compliance Plan, Corporate Compliance Policies and Procedures, and Code of Conduct.

SOUTHERNTIERCONNECT

- Follow Southern Tier Connect’s Code of Conduct and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.
- Be alert to any situation that could violate Southern Tier Connect’s Code of Conduct, policies and procedures, guidelines, and/or federal and state laws and regulations.
- Promptly report any issues, concerns, violations or suspected violations to your supervisor, Compliance Officer, or the Executive Director

Policy Approval History

Date	Action	Approved by
03/2023	Effective	QAC

