

Code of Conduct

Grand JiVante has adopted the following Code of Conduct as a central part of our Compliance Program. Compliance with the Code of Conduct is a condition of employment and shall be an element in evaluating performance for all employees. Violations of these standards will result in discipline being imposed up to and including possible termination.

- Honest and Lawful Conduct

One of Grand JiVante's strongest assets is a reputation for integrity and honesty. All employees, board members, volunteers and vendors will accurately and honestly represent Grand JiVante and will not engage in any activity or scheme intended to defraud anyone of money, property, or honest services. Everyone must comply with the Code of Conduct and report any action they think may be unlawful.

- Cooperation with the Compliance Program

To be effective, all employees, board members, volunteers, and vendors of Grand JiVante must work together to ensure the success of the Compliance Program. Each employee is responsible for acquiring sufficient knowledge to recognize potential compliance issues applicable to their duties. Any employee, board member, volunteer or vendor who believes or becomes aware of any violation of this Code of Conduct or any illegal activity by a director, officer, employee or another person acting on Grand JiVante's behalf shall promptly report the violation or illegal activity. All suspected violations of any State or Federal Law, or any violations of Grand JiVante's own policies and procedures or Code of Conduct must be reported to the Compliance Officer.

- Compliance with State and Federal Laws

All employees, board members, volunteers, and vendors of Grand JiVante will comply with State and Federal laws in all of their business dealings and avoid dealing anything that could create even the appearance of impropriety. All claims for payment will be accurate and consistent with the requirements of all Federal and State health care programs

- Billing, Coding and Documentation for Services

All federal and state regulations governing billing, coding and documentation will be fully followed by all physicians, therapists, nursing home, and other medical services billed by

Grand JiVante. Thus all billing and coding for services must be accurate and truthful, and no personnel should ever misrepresent charges or services to, or on behalf of, a patient or third party payor.

Only those medical services that are consistent with acceptable standards of medical care may be billed. Billing and coding must always be based on adequate documentation of the medical justification for the service provided and for the bill submitted, and this medical documentation must comply with all acceptable regulations. Only those codes that correspond to the services provided and documented should be selected.

- Disclosure Program

Grand JiVante is committed to non-retaliation and to maintaining confidentiality and anonymity, as appropriate, with respect to disclosure to any violations to the Compliance Officer.

- Confidentiality

Employees, board members, volunteers, and vendors will strive to maintain the confidentiality of individuals served and other confidential information in accordance with applicable legal and ethical standards. Confidential information will not be used for any purpose other than to carry out the business of the organization.

- Conflict of Interest

Directors, officers, board members and employees owe a duty of undivided and unqualified loyalty to the organization. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of Grand JiVante. All personnel are to disclose to the Compliance Officer any conflicts of interest in outside companies, entities, or concerns. Conflicting interests can include both financial interests and non-financial relationships with entities that compete or do business with Grand JiVante, and include any interests that otherwise could create an appearance that the personnel's conduct on behalf of Grand JiVante might be compromised in some way by the competing interest.

- Business Relationships

Business transactions with vendors, contractors and other third parties shall be transacted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

- Protection of Assets

All employees will strive to preserve and protect Grand JiVante's assets by making practical and effective use of its resources. All purchasing decisions must be made with the purpose of obtaining the highest quality product or service for the residents' at the most reasonable price. No purchasing decision may be made based on any consideration that any employee, officer, or trustee, or any family member or friend of them, will benefit from the transaction. Nor can any service or item be purchased in return for a referral of patients from another or with a view towards inducing another to refer patients.

- Fundamental Values

The actions of all employees, directors, volunteers and vendors are based on the fundamental values of Grand JiVante which include: Service, Teamwork, Accountability, and Respect. It is our mission to endlessly serve those who need our services in a way that respects their individual wishes and rights and while doing so, we will hold each other accountable and work as a team so we can deliver the highest quality healthcare for those that we serve each day.

- Responsibilities

All personnel, including employees, officers, and supervisors have the following responsibilities under the Compliance Program:

Employees must know and follow the Federal and state laws, rules, and regulations that apply to their jobs. Employees must also comply with the standards set forth in Grand JiVante's Code of Conduct and any applicable department compliance protocol. Most importantly, all employees are to act with honesty and integrity and do what is best for Grand JiVante and the residents that are being served. Any violation of these standards will result in disciplinary action.

Management Team members must create and maintain a work environment in which ethical concerns can be raised and openly discussed. Management must also ensure that staff understand the importance of the Compliance Program and Grand JiVante's Code of Conduct, and that staff are aware of the reporting procedures for suspected unlawful activity. Management is responsible for hiring only those individuals that will meet the company's values and will be able to follow the Code of Conduct successfully. Finally, Management is responsible for ensuring the Code of Conduct is being followed by all employees and that everyone in the organization knows to do the right thing.

Board of Directors will exercise reasonable oversight with respect to the implementation and effectiveness of the compliance program. The Board of Directors will be proactive in regards to their duties as it relates to compliance oversight and will do this by setting expectations and asking the right questions. The Compliance Program will be understood

by all members of the Board of Directors and compliance training will be provided on an annual basis with the program being reviewed annually. The Board of Directors will strive to build and sustain a commitment to ethics and compliance.

Contractors and Other Providers. All persons and entities with which Grand JiVante contracts with will be asked to cooperate with our Compliance Program. This includes individual physicians, physician groups, hospital networks, therapy providers, vendors, contractors, and other healthcare providers.