



Standards of Conduct for all Affected Individuals

February 15, 2023



Standards of Conduct for All Affected Individuals

- Affected Individuals observe HCS' compliance policy as expressed in its Compliance Policy and Procedures Handbook and all applicable rules, laws and regulations.
- HCS does background checks to ensure that all affected individuals have not been sanctioned by any regulatory agency.
- HCS maintains supporting documentation for all services rendered.
- HCS records services accurately to ensure proper billing.
- HCS bills only for services it has provided.
- HCS follows established financial and accounting principles and practices.
- All affected individuals who suspect that fraudulent or improper documentation or billing is occurring must report such suspicion to the Corporate Compliance Officer (or their immediate supervisor or manager).
- Supervisors and managers have the responsibility of fostering a work environment in which employees can report suspicions or violations of non-compliance without fear of intimidation or retaliation.
- Affected individuals must avoid conflicts of interest. Conflicts of interest can occur when an affected individual is faced with a choice between his/her responsibility to HCS and an outside or personal interest. Conflicts of interest include, but are not limited to, conducting agency business with a company, business or person with whom the affected individual has a direct business or personal interest; soliciting or offering agency business or services in exchange for payment or other consideration.
- Affected individuals are responsible for reporting to the corporate compliance officer (or their immediate supervisor or manger) any suspicions or actual knowledge they have regarding non-compliance.
- Affected individuals are responsible for cooperating in investigations of allegation of non-compliance.
- Affected individuals who fail to report suspicions or actual knowledge of non-compliance or who do not cooperate with investigations can be subject to disciplinary action up to and including termination of employment or contract.