Standards of Business Ethics and Conduct



enhabit
Home Health & Hospice

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A letter from Dale Clift

As a national leader in home-based care, Enhabit Home Health and Hospice has a responsibility to set high standards when it comes to patient care and business integrity.

Our purpose is to provide high quality, compassionate care to every patient. To do that, we must remain true to the principles outlined in our Standards of Business Ethics and Conduct (the "Standards"), regardless of the circumstances.

Our commitment to the highest standards is driven by our team of talented employees. We are dedicated to ensuring there's a place for everyone in our company by embracing all backgrounds, perspectives and ideas.

The Standards describe a set of shared principles upon which we will continue to build a reputation for excellence. These Standards apply to all aspects of our business. All of us are expected to be familiar with the Standards and use them to govern our conduct at work and when acting on behalf of Enhabit. In addition, each of us is required to acknowledge that we have read, understood and agreed to abide by the Standards.

I encourage each of you to embrace the Standards so that we can foster a culture of integrity, openness and inclusion. Our shared commitment to these core principles is fundamental to our company's success and ensuring that every patient receives the health care services they want and deserve.

Sincerely,

Dale Clift
President and CEO
Enhabit Home Health & Hospice

Our company purpose and values

Our purpose

To provide high-quality, compassionate care to every patient wherever they call home.

Enhabit in Action



People

We believe our people are our greatest asset. We value the diversity they bring, and want every employee to feel welcomed, valued, respected and heard. We believe in celebrating our people and are committed to balancing the important work we do with their personal lives.



Integrity

We are dedicated to doing what is right at all times. We understand the importance and impact of our work, which is why we approach everything we do with honesty and integrity.



Compassion

We focus on building meaningful relationships so that we can provide high-quality, compassionate care to every patient. We are committed to treating our patients and their loved ones with kindness, dignity and respect.



Excellence

We are always learning and improving so that we can expand what's possible for patient care in the home. We hold ourselves to the highest standard by pursuing quality and excellence in all that we do.



Teamwork

We value collaboration and are intentional about working together so that every team member feels supported. We leverage the diverse experiences and expertise of each employee to collectively meet the needs of all those we serve.



Communication

We expect transparent and respectful communication. We believe frequent, positive communication helps us connect with patients, their loved ones and each other.

Who is covered by the Standards

The Standards apply to all Enhabit directors, officers, employees, contractors and volunteers (collectively, "Covered Persons"). Other professionals who provide health care, financial or accounting services to, or on behalf of Enhabit, are also expected to conform to the Standards while providing services on behalf of Enhabit.

Why we have the Standards

The Standards are designed to empower Covered Persons to exercise good judgment by providing guidance about key compliance issues, offering practical answers to situations they may face and pointing them in the right direction when they need answers or guidance. The purpose of the Standards is to create a positive work environment that promotes quality patient care, ethical behavior, mutual respect and fairness.

Covered Persons should always operate in accordance with legal or regulatory guidance and act with the highest level of integrity. When in doubt, seek answers from available resources, including these Standards. No single set of business rules can address every situation. Therefore, a number of other resources are available within Enhabit to provide assistance with specific questions or concerns. See the Quick Reference Guide at the end of the Standards for a list of additional resources.

When faced with a decision, we should all use the Standards and the other resources available, as we ask ourselves:

- Is the action consistent with our core values?
- Can this action withstand public scrutiny?
- Will the action protect our company or expose our company to risk?



Why we act with integrity

Ethics and integrity are at the core of who we are and are reflected in our core values as well as the Standards. Whether engaged in clinical practice with patients, in negotiations with vendors or interactions with colleagues, Covered Persons are expected to conduct all activities performed on behalf of Enhabit with the highest level of integrity – whether or not a law or regulation guiding the activity exists. Furthermore, if you are a member of a profession governed by its own rules of ethics or code of conduct, then our company expects you to abide by those rules in addition to the Standards.

Integrity

We are dedicated to doing what is right at all times. We understand the importance and impact of our work, which is why we approach everything we do with honesty and integrity.

Your obligations under the Standards

You have a responsibility to yourself, your colleagues, our patients, our company and our community to conduct business legally, ethically and in accordance with our core values and these Standards. You are expected to read and understand the Standards and apply them every day in the course of your job or dealings on behalf of Enhabit. It may sometimes seem easier to keep silent or look the other way, but taking no action can result in serious consequences. Remember, we cannot honor our company's commitment to integrity if we ignore concerns about suspected illegal, noncompliant or unethical actions.

Waiver of the Standards

For members of the board of directors and our executive officers, compliance with these Standards may not be waived except by action of the board of directors or a committee thereof. For all other Covered Persons, compliance with these Standards may not be waived except upon written permission of the general counsel or chief compliance officer or their designees.



Legal obligations

Enhabit will comply with federal, state and local laws and regulations that apply to our business. We will reject any business opportunity that would require us to act illegally or in a manner that is inconsistent with these Standards.

- You are expected to know the basic laws and regulations that apply to your job. If you have questions, ask a supervisor or contact one of the company resources listed in the Quick Reference Guide. You are also expected

to know and follow the Enhabit policies and procedures that apply to you and to utilize company processes and systems in accordance with those policies and procedures.

- The company will not employ or contract with any person or entity that is ineligible to participate in federal health care programs.
- Suspected violations of law or Enhabit policies must be promptly reported to a supervisor or the legal department or another company official. See the "Ask questions and voice your concerns" section within these Standards for more information.



Competitive pressure or "industry practice" is never a valid basis for violating company policy or regulatory standards. If you believe that a competitor is achieving a commercial advantage by ignoring legal or regulatory requirements, contact the legal department or the ethics and compliance department for assistance.

Violations of the Standards or legal obligations

Failure to comply with law, policy or the Standards can lead to serious consequences for you, your fellow employees, other Covered Persons and our company. These may include: termination of employment; termination of contract; incarceration; personal or corporate fines; exclusion from Medicare and other health care programs; loss of credibility with lending institutions; loss of respect by physicians, patients and the community; and poor quality of care.

Because the consequences of not following law, policy or the Standards are so serious, disciplinary action, up to and including termination of employment or contract, will be taken against any Covered Person who:

- Authorizes or participates in any violation of law, policy or the Standards
- Fails to report or conceals a violation of law, policy or the Standards
- Refuses to cooperate with any internal investigation or audit
- Threatens or retaliates against anyone who reports a violation

Any supervisor or manager will be subject to disciplinary action if they knew, or should have known, about a violation of law, policy or the Standards and failed to take reasonable actions to prevent or promptly report and correct the situation.

Ask questions and voice your concerns

Open discussion of possible compliance concerns without fear of reprisal is vital to the effectiveness of our ethics and compliance program. Ask questions about policies or practices that you do not understand and promptly report suspected violations of law, policy or the Standards to a supervisor or other appropriate persons.



Communication

We expect transparent and respectful communication. We believe frequent, positive communication helps us connect with patients, their loved ones and each other.

Likewise, supervisors and managers are required to report suspected violations of law, policy or the Standards to the ethics and compliance department or the legal department. Our policies on Non-retaliation and Compliance with Federal and State False Claims Acts, prohibit retaliation against anyone who raises a concern in good faith.

Any of the following resources, as well as those listed in the Quick Reference Guide, can assist you with questions and concerns.

Your supervisor or department manager

Many questions and problems are best addressed at the department or branch level. Your supervisor or department manager has access to helpful resources and also knows you and the issues in your workplace better than anyone else. If a supervisor or department manager does not have an answer, they can reach out for assistance from others in our company.

If your concern is about your supervisor or department manager, you should address the issue with another resource listed in the Quick Reference Guide.

Ethics and compliance department or chief compliance officer

Questions or concerns relating to health care or other regulatory issues or suspected violations of law, policy or the Standards should be brought to the attention of the ethics and compliance department. You may also contact the chief compliance officer directly to discuss concerns or report issues.



Ethics and compliance contact

Enhabit, Inc.
Ethics and Compliance Department
6688 N. Central Expressway
Suite 1300
Dallas, TX 75206

Phone: 855.932.6675

Email: wecomply@ehab.com

Confidential ethics and compliance hotline

If your concern has not been resolved to your satisfaction, or if you feel uncomfortable raising a concern through your supervisor, department manager or other company managers, you may call the toll-free Enhabit ethics and compliance hotline (the "hotline") at **833.254.2212** or email **wecomply@ehab.com** to report a concern confidentially and anonymously. Your anonymity will be protected up to the limits of the law. All reports received by the hotline will be investigated. If a report is substantiated, appropriate corrective actions will be taken.

You may also make an anonymous report to our compliance hotline operator by scanning this QR code.

Accounting, financial misstatement and financial reporting

Questions or concerns relating to accounting, financial misstatement, financial reporting and/or safeguarding of assets should be brought to the attention of Enhabit's internal audit department or the company's general counsel. Internal audit may be reached by the following:

Internal audit contact

Enhabit, Inc.
Internal Audit Department
6688 N. Central Expressway
Suite 1300
Dallas, TX 75206

Phone: 833.254.2212

If you prefer to report a concern confidentially and anonymously, you may contact the ethics and compliance hotline and the report will be triaged to the internal audit department for review. Both anonymity and non-retaliation guidelines apply to any reported concerns that are directed to the internal audit department.

Human resources department

If your question or concern involves a human resources or general workplace issue, contact your local human resources representative or the Enhabit human resources department at:

Human resources department

Enhabit, Inc.
Human Resources Department
6688 N. Central Expressway
Suite 1300
Dallas, TX 75206

Phone: 877.330.7657

While you will never be turned away if you bring a human resources issue to the attention of the ethics and compliance department, a human resources representative will likely investigate your concern if it involves only workplace or other human resource issues.

Here are some examples of the types of concerns that are typically addressed by each department:

Human resources

- Concern about a hostile work environment
- Problems with a supervisor or co-worker
- Concern your agency is understaffed
- Not getting paid correctly for overtime

Ethics and compliance

- Concern that someone is not following a regulatory requirement
- Retaliation after a good faith effort to report a suspected violation
- Potential Health Insurance Portability and Accountability Act (HIPAA) violation
- Concern about a suspected conflict of interest
- Suspected fraudulent activity
- Suspected theft from a patient or potential exploitation of a patient

Clinical excellence department

While the vast majority of concerns are managed quickly at the branch level, if you become aware of a quality-of-care complaint that has not been appropriately addressed at the local level, call **877.330.7657** for prompt assistance from the clinical excellence department.

Our commitment to our patients



STANDARD

We will provide high-quality, compassionate care to our patients safely and in accordance with the highest of professional standards.

Patient care will be provided only upon medical orders issued by a physician or another authorized health care professional based on the needs of each patient. We will always act in the best interest of the patient.

Excellence

We are always learning and improving so that we can expand what's possible for patient care in the home. We hold ourselves to the highest standard by pursuing quality and excellence in all that we do.

Key points to remember

- The well-being of patients should be the focus of all of us, whether our roles involve direct patient care or other supportive functions.
- Services should be medically appropriate for the patient. We will not over-utilize or under-utilize the services to our patients.
- Only persons with appropriate training or professional credentials and licenses may furnish or supervise the delivery of medical care. All professionally credentialed personnel are expected to keep their credentials current and to notify the company promptly if sanctions are threatened or imposed on a professional license.
- No health care professional should ever furnish a service or take any action that would violate a professional code of ethics or practice act.

STANDARD **We will treat our patients with dignity and respect.**

We strive to always show compassion in our work and this includes treating all patients with dignity and respect. Patients will not be denied access to medical services based on age, race, ethnicity, religion, culture, language, physical or mental disability, socioeconomic status, sex, sexual orientation, gender identity or expression or any protected classification.



Compassion

We focus on building meaningful relationships so that we can provide high-quality, compassionate care to every patient. We are committed to treating our patients and their loved ones with kindness, dignity and respect.

Key points to remember

- Respond promptly and courteously to patients' questions and concerns.
- Provide adequate and accurate information to patients and their families in order to allow them to participate in treatment planning and to make informed treatment decisions.
- Safeguard the personal property of patients.
- Do not offer gifts to, or accept gifts from, patients or their family members of more than nominal value. Avoid any perception that the quality of care furnished is dependent on the offering of gifts or other gratuities. You should not accept cash or cash-equivalents from patients or their family members.
- Do not offer gifts or other financial benefits to Medicare or Medicaid beneficiaries in order to induce them to choose Enhabit.
- Provide to all patients a list of their rights and responsibilities and the Notice of Privacy Practices upon admission as a patient and upon request.



Q&A:

Who should I contact if I see a patient not being treated respectfully?

Step in immediately to redirect any situation that could put a patient at risk, then promptly talk to your supervisor or manager.

If necessary, you may also talk to your branch director, director of operations or immediate supervisor. You can call the home office human resources department at **214.239.6500** or the ethics and compliance hotline at **833.254.2212.**

STANDARD **We will provide safe patient care.**

Safe patient care is essential to the well-being and recovery of our patients. We will promote a corporatewide safety culture based on clinically appropriate policies, systems and equipment.

Key points to remember

- If a Covered Person has a question or concern about whether the company's quality or patient safety commitments are being met, that Covered Person is obligated to raise the concern to a supervisor or manager until it is satisfactorily addressed and resolved.
- Patient care services shall be provided in a manner that is safe and effective at all times.

STANDARD **We will maintain accurate clinical records.**

All clinical records should be accurate, timely, complete and consistent with our policies and applicable regulations.

Key points to remember

- Medical record entries should be complete and factual when related to an event, course of treatment, patient condition, response to care and deviation from standard treatment.
- If the original entry is incomplete, follow policy guidelines for making a late entry, addendum or clarification.

Q&A:

I have access to confidential patient information as part of my job. Can I look up anybody's record, even if they are not my patient, as long as I keep the information to myself?

No. It is only acceptable to access patient information when it is necessary for your job. Accessing protected health information ("PHI") for any other reason can jeopardize the patient's privacy and your privilege to practice or remain employed by or contracted with Enhabit.

STANDARD

We will protect the privacy of our patients' health and financial information.

Our branches collect and use information about a patient's medical condition, medical history, medication and family illnesses to provide quality care. We realize the sensitive nature of the data and are committed to protecting the privacy and security of this information. Consistent with HIPAA, we will not use or disclose patients' PHI unless otherwise required or permitted by law. We will also protect patients' financial data in accordance with all applicable state and federal laws.

Key points to remember

- Everyone must take reasonable measures to protect the confidentiality of PHI, whether that information is presented in oral, written or electronic form.
- No one has general authorization to access PHI. Only those who require specific patient information to furnish care, perform quality control activities, bill or collect charges for services, or furnish other administrative services are permitted access to that PHI unless authorized under the law or by the patient.



- Dispose of paper and other records containing PHI and financial data only in secure (locked) shredding bins; open recycling and trash bins are NOT secure and should not be used to discard PHI or financial information.
- Hand off information containing PHI only after you have confirmed that you are giving the information to the correct patient or individual.
- Credit card information may not be communicated through email or fax. If information is requested, the credit card information must be truncated prior to communication.
- Be careful when faxing; ensure the fax number is correct and the correct number has been entered into the fax machine.
- If you suspect that a patient's health information has been compromised, you must immediately contact Enhabit's chief compliance officer (refer to the Quick Reference Guide for contact information).

STANDARD

We will not discriminate against patients based on their race, color, national origin, sex, age, disability or other protected classification, nor on the basis of sexual orientation or gender identity.

We treat all patients with dignity and respect. We do not tolerate discrimination or harassment. We offer equal access to care in an inclusive environment where all patients are welcome. We provide culturally competent care that addresses identified racial and social disparities. We provide inclusion and diversity training to our workforce to help them identify unlawful discrimination and harassment and recognize unconscious biases.

Key points to remember

- Seek to understand patients' perspectives.
- Participate in mandatory culture and diversity awareness training.
- Listen attentively to patients without judgment and be sensitive to cultural needs.
- Reject existing stereotypes and challenge long-held beliefs about marginalized populations.
- Be mindful of each patient's unique needs and affirm their individuality.

STANDARD

We will provide culturally competent, patient-centered care.

We systematically identify health disparities that impact our patients. We seek to address cultural barriers to care. We actively seek to understand social determinants of health in order to provide holistic and individualized care. We are respectful of each patient's individual circumstances, needs and preferences.

We acknowledge and seek to understand diverse cultures and backgrounds of patients and their families to better meet their needs. We deliver culturally inclusive health care.

Key points to remember

- Respect cultural differences and seek to accommodate them when possible.
- Address any potential health inequities at all stages of the care episode.
- Always strive to meet or exceed the needs and expectations of the individuals we serve by creating a culture of comfort, professionalism and respect.



STANDARD

We will ensure patients, their providers and appropriate third parties have access to electronic health information when they need it.

Enhabit's interoperability of health information technology (IT) practices enable the secure exchange and use of electronic health information (EHI) without special effort on the part of the user. Enhabit IT practices allow for access, exchange and use of all electronically accessible health information for authorized use under applicable state and federal law. We will not implement IT practices that may lead to, or appear to lead to, fraud, waste or abuse, or impeded innovations and advancements in health information access, exchange and use. It is the aim of Enhabit never to engage in any practice that may be viewed as information blocking, such as unreasonably withholding patient information from those who are legally permitted to obtain it.

Key points to remember

- Patients have the right to view their own medical record information in the manner they request, including electronically.
- We will not unreasonably withhold patient information from those who have proper authorization or legal reason to have it.
- Always verify the legal authority and identity of the person requesting patient information.
- Report accusations that Enhabit is blocking legal access to patient information to the chief compliance officer.

Our commitment to each other

STANDARD

We will foster a respectful and inclusive workplace free of discrimination, harassment or violence.

We value a diverse workforce and an inclusive culture, which contributes to creativity and business growth. We do not tolerate unlawful discrimination or harassment. We will not tolerate physical violence or threats of violence. This includes abusive or aggressive behavior intended to threaten or intimidate another person.

Teamwork

We value collaboration and are intentional about working together so that every team member feels supported. We leverage the diverse experiences and expertise of each employee to collectively meet the needs of all those we serve.



Key points to remember

- Treat team members and patients with dignity and respect.
- Everyone is responsible for ensuring that our company is free from discrimination and harassment.
- If you know or suspect that someone is being harassed or discriminated against, report it to your supervisor or manager, human resources representative or the ethics & compliance hotline.

Q&A:

One of my co-workers is going through a difficult divorce, and he has not been himself lately. He gets angry and yells at people over any small issue, and I am scared that he may become violent. What should I do?

Your co-worker's behavior is aggressive and is not acceptable. This should be reported immediately to your supervisor or manager or human resources.

STANDARD

We will foster a safe and healthy environment free of substance abuse.

Enhabit has a vital interest in maintaining a safe and healthy environment. All Covered Persons must be free from the impairment caused by alcohol, drugs or other substances (even those permitted under state law).

Key points to remember

- Alcohol, illegal drugs and controlled substances can adversely affect safety, productivity, attitude and judgment. They have no place at Enhabit.
- Being under the influence of drugs or alcohol on the job poses serious safety and health risks to the user and all who come in contact with the user.
- Employees should seek assistance through their health care provider before substance abuse problems lead to attendance or performance problems.

STANDARD

We do not tolerate retaliation.

Anyone who, in good faith, is following these Standards and doing the right thing, will not be retaliated against for doing so. This includes:

- Seeking advice
- Raising a concern
- Asking a question regarding a policy or practice
- Reporting actual or suspected misconduct
- Participating in an investigation or legal proceeding

We take claims of retaliation seriously. If you believe that you, or someone you know, is the subject of retaliation for reporting a compliance or financial integrity concern, immediately report it to your human resources representative, the chief compliance officer or general counsel. The company investigates all allegations of retaliation.

A good faith report is one that is made with the sincere intention to inform Enhabit leadership of an action, activity or behavior that the Covered Person honestly believes to be a violation of legal or regulatory obligations, internal policy or the Standards.

Key points to remember

The facts and circumstances of each situation will determine whether a particular action was motivated by legitimate reasons or retaliation. Depending on the facts, examples of retaliation may include:

- Firing or laying off
- Making threats
- Demoting
- Harassment
- Disciplining
- Reassignment to a less desirable position
- Actions affecting prospects for promotion
- Reducing pay or hours
- Subtle actions, such as isolating, ostracizing, mocking or falsely accusing the employee of poor performance
- Denying overtime or promotion

STANDARD **We protect the health and safety of our co-workers.**

We strive to be a leader in safety and rely on the sound judgment of all Covered Persons to operate our home health and hospice branches safely. Success requires not only attention to detail, but also compliance with our policies and the consistent execution of safe work practices on the job.

Key points to remember

- Everyone is expected to be familiar with the potential hazards in their workplace and to comply with government regulations and company policies relating to workplace safety, such as:
  - Safety management improvement plans
  - Standard precautions for potentially infectious materials
  - Storage and use of hazardous materials
  - Safety and emergency plans
  - Ergonomic safety
  - Infection control procedures
  - Sentinel event and other incident reporting
- Federal and state laws regulate the handling and disposal of many infectious materials (e.g., blood and other bodily fluids, used needles and syringes or chemicals) that may present a hazard to Covered Persons or to the local community if not properly controlled.
- Any unsafe conditions should be reported promptly to a supervisor, manager, human resources representative or the ethics and compliance department at **214.239.6500** or the ethics and compliance hotline at **833.254.2212**

STANDARD

We provide equal opportunities in employment and advancement by actively promoting diversity and inclusion in recruiting, hiring and promotion practices.

We recognize and embrace differences within our workforce. In alignment with our core values, we recruit qualified applicants from various backgrounds for positions at all levels within the company. We offer equal employment opportunities regardless of a person's race, ethnicity, sex, sexual orientation, gender identity or expression, religion, national origin, color, creed, age or any other protected classification. We employ a merit-based progression system that seeks to promote equity in advancement decisions and succession planning.

We frequently communicate our commitment to diversity, equity and inclusion in words and in action. We routinely assess the diversity of our workforce, and develop initiatives to foster an inclusive and equitable workplace.

People

We believe our people are our greatest asset. We value the diversity they bring, and want every employee to feel welcomed, valued, respected and heard. We believe in celebrating our people and are committed to balancing the important work we do with their personal lives.

Key points to remember

- An inclusive, diverse and equitable work environment starts with you. Treat everyone you encounter fairly and with dignity and respect.
- Report incidents of discrimination or harassment immediately.
- Be respectful, open and civil when engaging in sensitive dialogue about social disparities.
- Comply with all laws, rules and regulations related to nondiscrimination and unlawful harassment.
- Seek to understand colleagues' backgrounds and cultures.
- Participate in mandatory culture and diversity awareness training.



Our commitment to our company

STANDARD | **We protect our confidential information.**

Confidential information includes all information that Enhabit has not publicly disclosed. This includes: nonpublic financial information; business strategies; contract terms; employment and personnel information; information about our relationships with patients, suppliers, providers or government agencies; proprietary information, such as trade secrets, software and protocols and procedures; and any other information that gives us a competitive advantage. We safeguard our confidential information because it is one of our most valuable assets.

We never use confidential information for our personal benefit, and we never disclose it to others (including family members and friends) or anyone at work who does not have a need to know it.

We also respect other companies' confidential information, including patients, business partners, and competitors. We do not bring confidential or proprietary information from previous employers or take Enhabit information if we leave the company. When we gather competitive intelligence, we do so legally and ethically.



Key points to remember

- Be careful not to inadvertently disclose confidential information by discussing it where others can overhear it, leaving it in public places or forwarding it by email outside the company.
- Your responsibility to protect the company's confidential information continues even after your employment or contract ends.
- This standard is not intended to restrict any legally protected activity or exercise of rights under applicable federal, state or local law.

STANDARD | **We are careful when communicating with the media.**

To protect our reputation and our company, and to make sure that any information communicated is accurate, only the company's marketing and communications department (and those preapproved by that department) is authorized to speak directly to the media about our company. If the media contacts you, direct them to the marketing and communications department.

Enhabit media policy

If you are approached by the media, let the reporter know that you are not an authorized spokesperson and are unable to answer questions on the company's behalf. Direct them instead to our media hotline **(972.338.5141)** or **media@ehab.com**.

A member of our communications team will work directly with the reporter to vet the media request and will then coordinate with the branch to determine next steps as needed.

Key points to remember

- Covered Persons are required to obtain specific approval from the legal department prior to disclosing to anyone confidential or "nonpublic" information about Enhabit.
- In general, only Enhabit's executive officers and specifically designated members of the marketing and communications departments should speak to the media about Enhabit.
- Covered Persons should coordinate any media contact with the marketing and communications department.



STANDARD **We are responsible on social media.**

We respect the rights of our Covered Persons to maintain personal blogs or post comments on social networking sites outside of the workplace on their own time. However, employees may not disclose on any personal blog or social networking site photographs or protected health information of patients or any other nonpublic confidential information of the company.

This standard is not intended to restrict the rights of employees covered by the National Labor Relations Act to engage in protected activity nor is it intended to limit employees' rights under any other applicable law.

Key points to remember

- Covered Persons are responsible for the content of their postings and publications on social media.
- Patient information and nonpublic information pertaining to Enhabit should **NEVER** be posted on social networking sites and/or blogs.
- Never post pictures of patients on social media.
- If you list your work affiliation on a social network, remember that your messages may reflect on our company and your colleagues. You should make it clear that you are speaking for yourself and not on behalf of Enhabit.

STANDARD **We use good judgment when pursuing outside activities and interests.**

Participation by Covered Persons in political, charitable, civic and other organizations is permitted and encouraged as long as it is done appropriately. Enhabit respects the diversity of interests among us. However, your participation should not cause an observer to conclude that Enhabit is endorsing the activity. Participation also must not impede your ability to perform your job. You may not pursue personal interests when you are required or expected to perform your duties and responsibilities for Enhabit.

Key points to remember

- Exercise good judgment and never engage in activities that impede your ability to perform your job.
- Do not use the property or resources of Enhabit for your personal activities.

STANDARD

We maintain accurate books and records and honor our reporting obligations.

Both federal law and our policies require that we disclose accurate and complete information about our business, financial condition, clinical outcomes and operations. Covered Persons must cooperate with government inquiries, as well as internal and external audits and investigations. Covered Persons will assist in the development, execution and enforcement of effective internal controls to ensure contracts, payments and other business transactions are properly authorized, conform to our policies and procedures and are recorded timely and accurately in accordance with generally accepted accounting principles. Covered Persons will also immediately report any material omission or any questionable accounting or audit matters to any supervisor, internal audit, legal or ethics and compliance departments.

Excellence

We are always learning and improving so that we can expand what's possible for patient care in the home. We hold ourselves to the highest standard by pursuing quality and excellence in all that we do.



Key points to remember

- Examples of improper documentation include but are not limited to: submitting inaccurate expense reports; making false or misleading statements in documents submitted to the government in order to receive payment; and miscoding procedures.
- Covered Persons should respond to any questions from the accounting department, internal audit and controls or the company's auditors promptly, completely and truthfully.
- Covered Persons should be familiar and comply with our record retention policies and procedures applicable to the documents in their control.
- Covered Persons are expected to adhere to applicable professional code(s) of ethics (e.g., CPAs with the AICPA's Code of Professional Conduct; nurses with the ANA Code of Ethics for Nurses; physical therapists with the APTA Code of Ethics for the Physical Therapist).
- Special care should be taken to preserve documents that are known to be subject to a government investigation, litigation or audit.

Q&A:

We have a bill ready to drop, and we are missing a critical item of documentation, which we expect to receive the next day. May we go ahead and send the bill?

No. Bills may not be submitted until all required documentation is accounted for and we can show all services were provided to the patient.

Certain documents in my possession have been placed on a "legal hold" by the legal department. I want to free up some storage space and copies of some of these documents are kept in other departments. May I shred or delete the ones I think are duplicates?

No. All documents that are related to a "legal hold" must be retained until you are notified by the legal department that the hold has ended.



STANDARD | **We protect the company's physical and financial assets.**

Everyone is expected to manage the company's physical and financial assets and other resources honestly and efficiently. This includes property of joint ventures or other entities that are affiliated with Enhabit. Covered Persons will obtain the proper authorization or approval prior to the use or commitment of company assets.

Each of us is responsible for protecting the company's assets, including physical assets (such as office and medical equipment, intangible assets (such as intellectual property), financial assets (such as bank accounts and currency), and electronic assets (such as passwords and keycards). We use company assets for legitimate business purposes and protect them from loss, theft, damage, misuse, waste, and carelessness.

Key points to remember

- Company assets should be used for business purposes only.
- When company property becomes surplus, obsolete or unusable, it should be disposed of in accordance with applicable policies and procedures.
- You should immediately report missing property, as well as any unusual circumstances surrounding the disappearance of company assets.
- Our funds may never be diverted for personal use, even temporarily, or used for any purpose that is not authorized and approved in accordance with applicable policies and procedures.



Q&A:

A colleague was working on a new therapy modality before she left. Can she tell her new employer about our new modality?

No. When your colleague was hired, she agreed that she would not use confidential information for her own benefit or disclose it to others, even if she developed the new modality. That obligation is a permanent one that continues even after her employment with Enhabit ended.

STANDARD | **We are cautious with gifts, meals and entertainment.**

We conduct our business based on the merits of our clinical services. Because giving or receiving gifts or hospitality to or from vendors, physicians and other referral sources can compromise our objectivity, or give the appearance that someone is trying to influence a business or clinical decision, Covered Persons should refrain from giving or accepting gifts, meals or entertainment.



Key points to remember

- An infrequent meal or other entertainment is usually acceptable if it is of reasonable value and the purpose of the meeting or attendance at the event is business related.
- Items or services that are customarily provided to all Covered Persons, such as discounted travel arrangements, are generally acceptable and not considered gifts. Discounts on personal purchases are also acceptable if they are generally offered to all covered persons.
- Gifts of cash or cash equivalents (such as gift card and gift certificates) in any amount are never permitted, nor is accepting any gift or hospitality that is illegal or is part of an agreement to do or give something in return to induce a referral.

Q&A:

May I give a physician a $50 Visa gift card out of gratitude?

No. Giving cash or cash equivalents - including gift cards - violates our Gifts, Meals and Entertainment policy.

A supplier has a luxury suite at the local stadium. Can I ask for tickets to a sporting event?

No. It's never acceptable to solicit gifts or hospitality from anyone doing, or seeking to do, business with our company.

STANDARD

We avoid conflicts of interest.

Conflicts of interest, as well as the appearance of conflicts, between your private interests and the interests of Enhabit are prohibited. A conflict of interest exists when you, or a member of your immediate family (e.g., spouse, domestic partner, parent, children and their spouses or domestic partner's children and their spouses), is involved in any activity that could affect your objectivity in making decisions. Covered Persons also should not compete with Enhabit; use its property, information or their positions with the company for personal gain; or take for themselves opportunities that are discovered through the use of the company's property or information or their positions with the company. Covered Persons owe a duty to the company to advance its legitimate interests when the opportunity to do so arises. Finally, do not make a personal investment in an entity if the investment may affect or appear to affect your judgment on business decisions relating to that enterprise. Be mindful of potential conflicts that may arise in investments in private and public companies, and be sensitive to any insider trading issues that may be associated with investments in public companies. This includes, without limitation, investments, financial interests or employment by a spouse or other immediate family member.

The following is a nonexclusive list of examples where a conflict of interest may exist:

- Steering business to a vendor in which the Covered Person or a family member has a personal financial interest
- Conducting private business on Enhabit's time
- Engaging in outside employment that interferes with the Covered Person's responsibilities to Enhabit
- Taking advantage of a business opportunity presented to Enhabit for the Covered Person's own purposes
- Receiving improper personal benefits, including loans or guarantees of obligations, as a result of your position with the company
- Marketing or promoting products or services in competition with Enhabit's current or potential business activities

Key points to remember

- Do not use your position, contacts or knowledge about the company for personal gain.
- In general, employees are permitted to hold other jobs and maintain other financial relationships, so long as doing so does not put the employee in a position to compromise confidential or proprietary information or prevent him or her from meeting the performance standards of their position at Enhabit.
- Any outside employment or other financial relationships that might present a potential conflict must be disclosed to your supervisor and to the human resources department. The conflicts of interest committee will evaluate and document potential conflicts and detail mechanisms for managing the conflicts, if applicable.

- If you have a question about whether a specific situation constitutes a conflict of interest or want to report any potential conflict of interest, you should disclose the matter to your supervisor or manager or the ethics and compliance department. To determine if a conflict of interest exists, Covered Persons may be required to provide additional information via an online questionnaire.



Q&A:

I mentioned to several competitors that we would soon be filing for regulatory approval to open a new agency. I just learned that one of our competitors has filed an application with a state agency to open a new agency. Did I do something wrong?

Yes. Discussions with competitors about commercial or competitive matters carry significant antitrust risk. Regulators may use these discussions to allege that industry members reached a tacit agreement to violate the law. Violations can be serious criminal matters resulting in severe fines for our company and fines and imprisonment for individuals.

Particular care should be taken when pursuing joint ventures or alliances with other health care providers.

Our commitment to our community

STANDARD | **We compete fairly.**

We will compete vigorously and fairly in the marketplace. Antitrust laws prohibit business practices that interfere with free and open competition among companies. Therefore, we will not seek to restrict competition through unlawful monopolistic or predatory practices.

Integrity

We are dedicated to doing what is right at all times. We understand the importance and impact of our work, which is why we approach everything we do with honesty and integrity.

We will never:

- Discuss or exchange information (public or private) relating to prices, fees, rates, costs, market shares, expansion plans, marketing programs, vendor and labor costs or terms and conditions of sale or supply unless authorized or otherwise permitted in the ordinary course of business
- Agree with our competitors to raise, lower or stabilize prices or any element of price, including discounts, fees, surcharges and credit terms
- Agree with our competitors to divide or allocate markets, services, territories or patients
- Agree to boycott any business
- Require customers or suppliers to avoid dealing with any of our competitors as a condition for keeping our business

Key points to remember

- Antitrust laws are complicated and can be difficult to understand.
- Violations of antitrust laws are subject to criminal sanctions, which may include fines or imprisonment.
- Consult with the legal department:
  - Before attending meetings with competitors where competitively sensitive issues may be discussed.
  - With any questions about the legality of agreements with competitors and the limits of permitted conduct.



STANDARD

We work professionally with trade associations.

Attending meetings of professional associations and trade associations is both legal and proper if they have a legitimate business purpose. However, we must be cautious when attending. Never discuss prices, fees or pricing strategies. In addition, do not discuss nonpublic financial information or other proprietary or competitively sensitive information.

Key points to remember

- Never discuss competitively sensitive information at industry meetings.
- If the discussion turns to competitively sensitive issues, clearly and unambiguously excuse yourself from the discussion. Immediately leave the meeting or hang up the phone, then notify the legal department.
- If you are uncertain whether a discussion topic is appropriate, defer the conversation until you have discussed it with the legal department.

STANDARD

We engage in fair dealing.

Covered Persons should deal fairly with Enhabit's customers, patients, suppliers, competitors and other Covered Persons, and should not take unfair advantage of anyone by manipulation, misrepresentation or abuse of information.

Key points to remember

- Covered Persons are expected to deal fairly and honestly with Enhabit in recording hours worked, scheduling and reporting time off, using Enhabit property, seeking reimbursement for business-related expenses and all similar matters.



Q&A:

I used to work for the local acute care hospital. Can I share details about their sales strategy with members of my group?

No. You have a responsibility to protect the confidential information of your prior employer just as you would have a responsibility to protect our confidential information if you left Enhabit. If you're unsure, do not disclose the information until you have discussed it with the legal department or the ethics and compliance department.

STANDARD | **We seek business openly and honestly.**

We do not offer, pay, authorize or promise to pay money or provide anything of value to government officials or government employees in order to retain or obtain business, or to influence or induce government officials or employees to take, or refrain from, a particular official act on our behalf. We also have a "no gifts" policy for members of Congress and state legislators and their staffs.

Key points to remember



- Bribes include money or anything of value (e.g., gifts, services, offers of employment, fee waivers, free tickets or upgrades) that can be used to obtain a benefit. There is no exception just because the value is small.
- Things that are generally not bribes include social engagements (e.g., working lunch with a business partner), reasonable and proportionate hospitality or promotional expenditures, and modest gifts to business contacts at certain times of the year (e.g., Christmas), unless given with the intent to obtain a benefit.
- Never give or offer money or anything of value to any other person if you know or suspect it will be perceived as a bribe to a government official or employee, such as making a contribution to a charity at the request of or for the benefit of someone else. Knowing or suspecting includes consciously avoiding the truth or ignoring clear red flags that a transaction is likely improper.
- Covered Persons who pay bribes are subject to criminal sanctions, including heavy fines and imprisonment.
- If a government official or employee ever demands a gift, service, special treatment or tickets to a sporting or other event, politely refuse and contact the ethics and compliance department or the legal department.
- The fact that something is a normal business practice by local standards does not make it permissible if it does not comply with law, policies or the Standards.

STANDARD | **We respect intellectual property.**

Intellectual property includes patents, trademarks, copyrights and trade secrets. All Covered Persons must safeguard Enhabit's intellectual property and keep it strictly confidential. Moreover, if you have access to another company's intellectual property, make sure you obtain authorization from the legal department to use it and that your use complies with our company's policies and procedures. We may also have confidentiality obligations under the terms of contracts with third parties. This includes keeping their software, source code and other proprietary information confidential from anyone not authorized to receive it.

Key points to remember

- Safeguard Enhabit intellectual property. Treat it as confidential.
- Violation of copyright laws can result in heavy fines. Covered Persons who willfully violate copyright laws can be subject to criminal sanctions as well, including imprisonment.
- Failure to follow contractual obligations to protect our vendors' confidential information could put the company and you at significant legal and financial risk.
- We treat others' confidential information with the degree of care required by our contractual obligations and, at a minimum, as confidential as we treat our own.



Q&A:

My friend at another health care organization forwarded me an industry survey report that her organization recently completed. Many of the observations in the survey report would be interesting to many of my colleagues at Enhabit. Can I forward the report to interested colleagues at Enhabit?

No. Since the report was not created by Enhabit or otherwise made public by your friend's organization, you should treat it as the intellectual property of that organization and maintain its confidentiality.

STANDARD | **We interact with the government honestly, ethically, and in accordance with the law.**

We will maintain the highest standards of legal and ethical conduct in transacting business with local, state and federal governments. We will not submit false claims or statements to a federal or state agency or in connection with any government contract. We will also not conceal, avoid or decrease a legitimate obligation to pay the government.



Excellence

We are always learning and improving so that we can expand what's possible for patient care in the home. We hold ourselves to the highest standard by pursuing quality and excellence in all that we do.

Key points to remember

- A company that submits false claims can receive heavy civil and even criminal monetary penalties.
- False statements contained in a government filing or report could subject the company or the employee responsible for preparing and submitting the filing or report to civil or criminal penalties.
- If you suspect that a false claim has been made, immediately contact the ethics and compliance department or the ethics and compliance hotline at **833.254.2212**.
- Immediately contact the legal department if you are contacted by a government agent in connection with an investigation of Enhabit.
- Immediately contact the legal department at **214.239.6500** or **877.330.7657** regarding investigations by the Occupational Health and Safety Administration (OSHA), Environmental Protection Agency (EPA) or the Food and Drug Administration (FDA).

STANDARD **We follow political contribution and lobbying laws.**

State and federal laws regulate when and how corporate funds may be used in the political process (e.g., direct monetary support of candidates and political parties or lobbying). Covered Persons are prohibited from using any corporate funds or resources to help or promote any political candidate or party unless they have obtained approval from the governmental affairs department. Unless otherwise permitted based on his or her position, Covered Persons must obtain written approval from the legal department before communicating with policymakers (congressional and executive branch) about state or federal legislation, executive orders, regulatory matters and other programs and policies and positions of any state or the U.S. government that may be related to Enhabit or other health care industry matters.

Key points to remember

- Lobbying laws can be complex, so if you have any questions about whether your activities on behalf of the company could be considered lobbying, contact the governmental affairs department or the legal department.

- Examples of prohibited activities include: using company funds to purchase tickets to a political event, paying colleagues to work at a political function or making cash contributions or offering company assets or services (such as a flight upgrade) to benefit a candidate or political party.
- Do not include any expense that could be considered a political contribution in any expense statement, disbursement or request for a disbursement of funds.
- Refrain from performing volunteer campaign work while at work and do not use company time, facilities, email or phone systems for political purposes.



- When participating in political activities do not speak or act on behalf of Enhabit or let anyone think that you are speaking or acting on behalf of Enhabit.
- Company policies are not intended to encourage or discourage Covered Persons from making personal contributions to candidates, parties or political action committees.
- Eligible Covered Persons may contribute to Enhabit's political action committee (PAC). However, no employee will be compelled or pressured to do so.
- Violations of campaign finance laws can receive heavy fines. Covered Persons who willfully violate the laws can be subject to criminal sanctions, including substantial fines and imprisonment.

STANDARD

We strictly adhere to all state and federal fraud, waste and abuse laws.

Federal law prohibits a health care provider from paying or receiving kickbacks or other improper inducements to or from anyone for the referral of a patient or for the purchase or ordering of health care products or services that are paid for with federal health care funds. Many states have similar laws. These laws also prohibit referrals of certain types of services that are paid by government entities to entities in which the physicians have financial relationships. Entities are prohibited from making claims for such services as well.

Key points to remember

- Fraud and abuse laws apply not only to physicians, health care professionals, hospitals and other referral sources, but also to nursing homes, case managers, discharge planners and other professionals in a position to influence health care referrals, purchases or orders. These laws cover:

- The offer or payment of a kickback or other improper inducement to secure referrals, purchases or orders
- The request or receipt of an improper payment in exchange for referrals, purchases or orders of health care services
- Improper payments or inducements can take many forms, including:
  - Above fair market value lease payments to a referral source or free or below fair market value lease payments from a referral source
  - Loans to referral sources with below market interest rates or other terms that do not meet commercial lending standards
  - Professional services contracts (e.g., medical director agreements) for more services than are needed or at rates in excess of fair market value
  - Management fees that fail to cover the full cost of services furnished to a referral source
  - Gifts or entertainment that do not follow our Vendor Relationships and Gifts policy.

- Improper inducements may be indirect, such as a payment or concession made to a third party with the expectation that it will be passed on to a referral source. Even the mere offer of a kickback or improper inducement could be a violation of law and could subject you and the company to criminal prosecution.
- Enhabit will evaluate the financial and ownership interests maintained by referral sources to ensure that applicable agreements are executed and referrals are monitored.

STANDARD **We safeguard the environment.**

We comply with laws that safeguard the environment and promptly address any situation that results in the unauthorized discharge or emission of pollutants into the air, ground or water. We also follow the laws for storing, handling and disposing of hazardous materials, gases, chemicals and biowastes.

Key points to remember

- A company that violates environmental laws may be subject to heavy fines and other penalties. Covered Persons who knowingly violate environmental laws are subject to criminal sanctions, including heavy fines, penalties and imprisonment.
- Follow all applicable laws for storing, handling and disposing of hazardous materials, gases, chemicals and waste.
- If you learn of a dangerous or hazardous environmental condition, report it immediately to your supervisor or manager, or to the ethics and compliance hotline (**833.254.2212**).

Additional resources



Enhabit's Standards of Business Ethics and Conduct is not an employment contract. Unless otherwise prescribed by contract or state law, employment with Enhabit is at will and may be terminated by either the employee or Enhabit at any time, for any reason or for no reason.

The most up-to-date version of this Standards of Business Ethics and Conduct is available online at **ehab.com**.

Quick Reference Guide

Ethics and compliance department

Health care compliance, patient privacy and business ethics issues

Robert Leech
Chief compliance officer
855.932.6675
robert.leech@ehab.com

Ethics and compliance hotline
833.254.2212

Legal department

Legal questions and concerns

Dylan Black
General counsel
877.330.7657
dylan.black@ehab.com

Human resources department

Workplace issues and concerns

Tanya Marion
Chief human resources officer
877.330.7657
tanya.marion@ehab.com