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Code of Conduct

Code of Conduct

I. Our Mission & Values

II. We Have Pride in Our Code

- a. Start Here
- b. Know Your Responsibilities
- c. Speak Up Without Fear
- d. Know Where to Go for Help

III. We Promote an Ethical, Diverse, and Inclusive Workplace

- a. Uphold Team Member Rights
- b. We Value Diversity, Equity, and Inclusion
- c. Promote a Safe Kadiant

IV. We Understand Our Responsibility to Others

- a. Uphold Client Rights
- b. Preserve Quality of Care and Safety
- c. Keep Private Information Private
- d. Respect Our Partners

V. We Do the Right Thing for Our Profession

- a. Be Professional
- b. Never Bribe
- c. Client Referrals
- d. Know the Rules about Gifts and Entertainment

- e. Fair Competition and Antitrust Regulations
- f. Marketing & Advertising
- g. Don't Trade on Inside Information
- h. Keep Accurate Records
- i. Follow Industry Guidelines

VI. We Safeguard Our Organization

- a. Protect Our Assets
- b. Avoid Conflicts of Interest

VII. We are Good Corporate Citizens

- a. Protect Our Reputation
- b. Government Investigation and Funding Source Audits
- c. Preventing Fraud, Waste, and Abuse
- d. Political Activity and Lobbying

VIII. We are Good Global Citizens

- a. Be a Good Steward
- b. Share Kindness and Make a Difference

IX. We Invest Our Energy in our Collective Future

X. Team Member Acknowledgement





Our Mission & Values

Through decades of our combined experience, we've earned the trust of our clients, communities, and partners, and we are committed to continuing to build trust as we live our mission of enabling people to live their absolute best lives.

Kadiant aspires to provide the highest quality ABA therapy and related critical services to individuals diagnosed with autism spectrum disorder (ASD) and related disabilities. Kadiant is its people, and our people are passionate about delivering excellent client services based on the latest research supported interventions. We aspire to be great at what we do, and we love doing it, individually and as a community.

Our values are a HUGE deal at Kadiant. They represent who we are, what drives us every day, and they guide our decisions. It is our goal that our values describe everyone's experience of Kadiant!

The kadiant Code

Reputations are hard to earn and easy to lose, and we are all in this together. When we talk about building the organization that we all want to work for, we mean working with our team members and business partners to demonstrate our core values every day. We hold ourselves and each other accountable to building an ethical foundation that builds trust. Do everything you can to enable people to live their absolute best lives and live our values every day.

If you have any questions about our Code or our policies, please contact our Chief Compliance Officer.

We Have Pride in Our Code

a. Start Here

Our Code reflects who we are and what's important to us. Kadiant is an organization with strong values of responsibility and integrity. We hold ourselves to the highest standards of ethics. Our Code contains general guidelines for conducting our services and ourselves with this high standard. It complements the Behavior Analyst Certification Board's Professional and Ethics Code for Behavior Analysts. It provides an overview of the laws, regulations and policies that apply to us and the work we do, but it does more than that. It builds upon our shared values.

That's why we count on every team member and Board member to follow our Code and make decisions that will preserve the trust that others have placed in us. We expect nothing less from our business partners, including our vendors, consultants and contractors – we understand the responsibility we have to communicate with them about our high standards of integrity and cannot ask them to violate any of our values and operating principles. Our Code is a great resource, but it doesn't cover every situation you may face on the job, so it's important to use good judgment in everything you do and to ask for help if you're ever unsure about the right course of action.

b. Know Your Responsibilities

Our good name is in your hands. No matter what job you do or where you do it, you are Kadiant. Consider all of your professional actions carefully and make sure your actions always reflect our values. Follow our Code and policies as well as the laws and regulations of the state where you work.

Complete your assigned training – it's the best way to stay up to date on what's expected of you.

If you see or suspect anything illegal or unethical, it may seem easier to look the other way or let someone else take the lead – but misconduct affects all of us. No concern is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation or audit. Be aware that anyone who violates our Code may face corrective action, up to and including termination of employment with Kadiant.

If you manage people, lead by example, making sure your team members know the Code is a resource for them. Of course, there should not be a difference between what you do and what you expect from others. Create the kind of workplace where team members feel comfortable coming forward with questions or concerns and support them when they raise issues.

c. Speak Up Without Fear

We don't retaliate or permit retaliation against anyone who raises questions or concerns about activities at Kadiant. Regardless of whom you contact, you can be confident that you're doing the right thing and that we investigate reports of misconduct thoroughly, disclosing information only to those who need it to resolve the issue. Likewise, never retaliate against team members for sharing concerns in good faith and prevent retaliation by others. As an organization, we know it takes courage to come forward and share concerns.

d. Know Where to Go for Help

There are people ready to support you. We want you to feel comfortable approaching your primary supervisor or anyone in the broader leadership team, such as your Support Supervisor, Clinical Director or Region Director, about any situation where you believe potential violations of policies, laws, or ethical standards have occurred. Ask for guidance or support related to policies and procedures. We also encourage you to provide positive suggestions and stories if you have them!

If you have questions that could not be answered by your immediate leadership team or want to share a concern outside of your team, the following resources are always here to support you:

- ✔ Kadiant's Chief Compliance Officer, Tammi Keating, Tammi.Keating@Kadiant.com
- ✔ Send a question or concern to Compliance@Kadiant.com for compliance-related questions
- ✔ Kadiant's People Organization leaders are available for HR-related questions at People@Kadiant.com
- ✔ You can also send feedback to Feedback@Kadiant.com

The leaders of these Kadiant departments will strive to keep the interaction confidential, where possible, if requested.

People Org
Email: People@Kadiant.com
Phone: (866) 523-4268

Kadiant Feedback
Email: Feedback@Kadiant.com
(Confidential Reporting)

The Compliance Hotline is Also A Resource Available to You

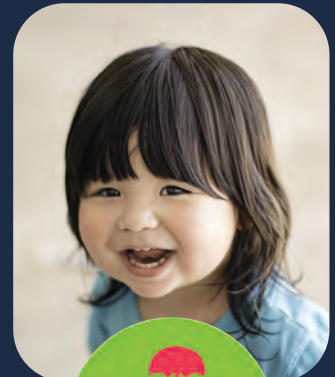
In situations where you prefer to place an anonymous report in confidence, you are encouraged to use the Compliance Hotline anytime, via phone or Web, which is hosted by our external hotline provider, EthicsPoint. The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose. This line is always guaranteed to be answered.

Report Online
Kadiant.ethicspoint.com

Report by Phone
(844) 764-2309

When you complete a report, you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-6 business days, use your report key and password to check your report for feedback or questions.

EthicsPoint is NOT a 911 or Emergency Service. Do not use this site to report events presenting an immediate threat to life or property. If you require emergency assistance, please contact your local authorities. See the EthicsPoint FAQs for more information



We Care about Doing the Right Thing

Nothing in the Code prohibits you from communicating with government agencies about possible violation of federal, state or local laws or otherwise providing information to government agencies, filing a complaint with government agencies, or participating in government agency investigations or proceedings, and our Code does not require you to notify Kadiant of any such communications.

We Promote an Ethical, Diverse, and Inclusive Workplace

a. Uphold Team Member Rights

Kadiant is committed to fair employment practices, period. We make employment decisions without regard to race, color, religion, gender, gender identity or expression, sexual orientation, national origin, genetics, disability, age, or veteran status. We respect the rights of every individual and abide by all applicable employment laws.

We support the principles established under the United Nations Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labor), physical punishment, forced or prison labor or human trafficking.

b. We Value Diversity, Equity, and Inclusion

We're successful today because of our remarkable people. We strive to be an inclusive and equitable team, and we value diverse ideas, experiences and backgrounds. We recognize that we operate in a world with systemic bias, and team members don't always have equitable opportunities. We are committed to helping dismantle those systems of bias, and we also

recognize that we have a lot of work to do. We ask that you do your part to honor and improve our workplace diversity and inclusion, and recognize the strengths and talents our diverse team members bring.

We expect our vendors and business partners to share our commitment to the same high standards. What can you do? Follow the employment laws where you work, be alert to abuses and speak up if you see or suspect possible labor law or human rights violations.

c. Promote a Safe Kadiant

We value the safety and security of every team member and client. Every team member is empowered to take immediate action for the safety of our people regardless of role, title or responsibility. If you see a situation that could put others at risk, take action, and at all times and in all places, work to keep yourself and your co-team members free from any physical or mental injury.

Kadiant has a zero-tolerance policy regarding acts or threats of violence. Be alert to what is going on around you, observe good security practices and speak up about any threats of

potential violence. We prohibit weapons on all of our physical locations, consistent with local laws – if you have concerns that someone may have a weapon in a Kadiant facility, report it immediately to your supervisor, a member of our Compliance Team, Kadiant Feedback or the Compliance Hotline.

Alcohol or other legal or illegal mind-altering substances can impair judgment and negatively impact work quality and the safety of those you work with. Having, using or distributing alcohol or legal or illegal mind-altering substances while engaged with clients or other support work effort is prohibited. There are occasional work events, conferences or other special occasions where consuming alcohol socially is acceptable in moderation as long as professionalism is maintained at all times. Please make sure you always comply with laws, Kadiant policies and values, and always exercise moderation and good judgment.

Safety Management Steering Committee

Kadiant maintains a Safety Management Steering Committee that meets to review internal and external information, evaluate safety management plans, develop support tools, and provide direction to all team members. For more information on Kadiant's Safety Management Steering Committee, please refer to Kadiant's Illness and Injury Prevention Program.

Hazard Reporting and Correction

Kadiant expects that all identified safety hazards are reported by team members to their immediate supervisor for resolution, per our Reporting Unusual Occurrences, Incidents, and Compliance Concerns policy. This policy indicates our commitment to and process for recording and investigating such occurrences. For more information, please review this policy.

What Would You Do?

Q: I work with a client in the home setting. I've noticed that the client's mom treats me differently than some of the other team members. For example, she always sits in the room when I am working with the client, and follows us when we move to other rooms. When I overlapped with another team member, the mom stayed in another room for most of the session. I'm concerned she might be doing this because of the color of my skin and/or my gender identity. What should I do?

A: At Kadiant, we are committed to upholding a diverse and inclusive culture. Please immediately notify your Clinical Supervisor, Support Supervisor, member of the People Organization, or other trusted Kadiant team member if you are facing discrimination in any way while at work. Your safety and dignity are our top priority.

We Understand Our Responsibility to Others

a. Uphold Client Rights

It is essential that all Kadiant team members understand our clients' rights, and that those rights are honored and upheld. This is consistent with Kadiant values and is particularly relevant to the population of clients that we serve. The following are some of the many client rights that we honor:

- ✔ Right to an Individualized Treatment Plan and treatment based on the Plan;
- ✔ Right to prompt medical care and treatment and involvement in such treatment;
- ✔ Right of access to referrals;
- ✔ Right to no unauthorized, experimental research;
- ✔ Right to a humane service environment, care and treatment, including the right to being free from abuse and neglect, seclusion, chemical or mechanical restraints;
- ✔ Right to informed consent;
- ✔ Right to services reflecting quality professional and ethical standards of practice.

Our clients deserve the right to effective treatment, and we work hard every day to ensure we are delivering services that live up to the highest standards in our field. The treatment Kadiant delivers is supported by research and evaluated routinely by our clinicians to determine treatment efficacy. We assess the needs of our clients using evidence-based assessments and advocate for the appropriate level of treatment.

We do not select clients based on pay rates from funding sources. We maintain standards and strongly encourage caregiver participation and training independent of the client's funding source.

At Kadiant, we believe access to care is an important part of quality care. We are committed to being transparent with our clients, caregivers, and funding source case managers about the existence of waitlist time, and if we misjudge or our capacity to serve changes, we will offer resources to obtain care from other providers if we are unable to initiate services within 45 days of contact.

Continuity and coordination of care is part of our quality program, even when insurance circumstances might change. We share benefits

information with our caregivers to assist them with communications with their funding sources. Our communications will clearly indicate timing of potential changes in services in the event of changes to the current benefit or coverage. We honor regulatory timeframes to ensure continuity of care whenever possible.

Kadiant is committed to ensuring we practice within the scope of our competence. We serve clients based on need and within the scope of our team members' education, training, and experience. When presenting behaviors of an existing client are beyond the scope of competence of our team members, we seek appropriate consultation and/or referral for the client to an appropriate provider.

b. Preserve Quality of Care and Safety

Kadiant families should have confidence they are receiving high-quality services in a safe environment that is perpetually improving. We want to preserve their trust.

Kadiant has developed internal systems (e.g., clinical quality evaluation via quality indicators, electronic incident reporting with follow-up functionality, internal billable audits) that help us closely monitor the quality and necessity of care we provide to our clients.

Clinical Quality: Kadiant developed a Program Quality Indicator (PQI) tool that assesses the quality of clinical programming at an individual level and in the aggregate.

What Would You Do?

Q: My client recently began engaging in a new, challenging behavior. I think I will need some additional support, training, and oversight before moving forward. What can I do?

A: First of all, thank you for adhering to your obligation to only provide services in new areas after receiving appropriate supervision and consultation! Kadiant is committed to providing the highest quality clinical care, so we've established the following resources and networks that you can access at any time:

- ✔ Ongoing Continuing Education from leaders in our field
- ✔ Supervisor Resources
- ✔ Professional Development Opportunities
- ✔ Clinical Collaboration Teams (Challenging Behavior and Skill Acquisition)

As a Kadiant team member, you have immediate access to a network of resources across the nation! Reach out and we will be happy to help.



At Kadiant, the safety of our clinical practices is supported by training, education and monitoring. Our safety management program evaluates events and improves processes and practices to reduce injuries and illnesses to our team members and clients.

Kadiant's Compliance Team assures compliance with the laws that govern our services and evaluates our services to identify risks that may impact our clients, caregivers, and funding sources. We honor the commitments we make to our clients and hold our vendors and business partners accountable, too.

Kadiant, however, is neutral when it comes to legal issues that arise between two caregivers, and we will follow legal requirements when determining what records we share with whom or what testimonies we might provide in a legal proceeding.

We will also abide by clients' rights related to personal, protected health information used and generated by Kadiant in providing services. This includes timely access to any requested copies of the record of the client's treatment and care, along with any requested, allowable restrictions from obtaining the record. Such practices are outlined in our Notice of Privacy Practices.

c. Keep Private Information Private

People trust Kadiant to protect their personal information. We respect the privacy of our clients, our families, our team members and others with whom we conduct business, and we handle their personal information with care. "Personal Information" is any information that could be used to identify someone, either directly or indirectly, such as a name, employee ID, email address, or phone number.

We strive to comply with data privacy laws that prescribe how to responsibly collect, store, use, share, transfer, and dispose of personal information. Our team members follow our policies and protect any personal information that is entrusted to them. We use this information only in the way it is meant to be used, and we don't share it with anyone inside or outside of the organization in an unauthorized manner.

Our team members practice good cybersecurity, too. We follow the processes and practices in place to protect our networks, computers, programs, and data from attack, damage, or unauthorized access. Please refer to Kadiant's Information Security Policy.



What Would You Do?



Q: I noticed that I could see other clients' and team members' SSN in our data platform. Is this ok?

A: Team members should not have access to any Protected Health Information (PHI) or Personally Identifiable Information (PII) beyond their regular clients. Kadiant will only share information that is necessary to perform your job duties. If you feel you have accidentally accessed someone else's PHI, please contact the Compliance Officer or your Support Supervisor immediately. We will review the information and develop an action plan as needed. We are so appreciative of your honesty and integrity in this matter!

d. Respect Our Partners

We value our external business relationships and work to be a good, responsible partner. We work with consultants (e.g., PowerBI experts, expert subject matter consultants), vendors (e.g., Learning Management System, Practice Management Product) and behavior analysis organizations (e.g., CASP, CalABA). We choose partners that share our values, and make decisions objectively, based on factors like quality, service, price, availability, and reliability. All team members do their part to hold our vendors and business partners to Kadiant's high standards and we ensure they operate ethically, in compliance with the law.

We work with our external stakeholders in the



communities we serve, such as federal, state and local governments, health insurance companies, school districts, and regional centers. In our contracts we follow the rules and never cut ethical corners; we always conduct business honestly, fairly, and transparently.

We take audits seriously and we comply and cooperate with inspections, investigations, or requests for information. All requests for information by a government official or other entity are addressed by Kadiant's Compliance Team. We always tell the truth; we never mislead anyone, impede their work or conceal, destroy or alter documents.

We Do the Right Thing for Our Profession



a. Be Professional

Kadiant team members are always professional and follow Kadiant's Code. We also follow the BACB Ethics Code for Behavior Analysts and the RBT Ethics Code. We are truthful and honest; we operate with integrity while engaged with all professional relationships. We maintain boundaries and are committed to ongoing training in culturally competent care. We use data to drive both our clinical and business decisions.

We encourage giving back to your profession and community through board service or other external collaboration as long as participation avoids conflicts of interest or interference with Kadiant responsibilities and your participation is shared and approved by your immediate supervisor.

b. Never Bribe

We work honestly and with integrity. At Kadiant, we do not offer bribes, accept bribes, or let others bribe on our behalf. We do not use any financial or other type of reward that could be construed as trying to induce:

- ✔ Potential clients to seek services through Kadiant;
- ✔ Team members and other licensed professionals to deny or limit care; and/or
- ✔ Activities to commit fraud, waste, or abuse.



The use of incentives, bribes, or "kickbacks" to induce such behavior is strictly prohibited. Remember, a bribe can be something other than cash. A gift, a favor, even an offer of a loan or a job could be considered a bribe if it's offered in exchange for a decision. Before offering anything of value, check our policies and ask questions about what's okay (and what's not). The laws in some states impose greater penalties for bribing government officials, but for us, it's simple: bribery – of anyone, at any organization, at any level – is always wrong.

Federal and state anti-kickback laws make it illegal for health care providers to knowingly and willfully accept bribes or other kickbacks in return for generating Medicaid or other federal health care business. This area of the law is complex. Keep in mind that there are stiff penalties for violations, including:

- ✔ Disciplinary action up to and including termination;
- ✔ Large monetary penalties;
- ✔ Exclusion from federal health care programs (for example, Medicaid); and/or
- ✔ Imprisonment up to five years.

See Section V (d) Know the Rules About Gifts, Hospitality and Entertainment for more information about what kinds of gifts are and are not acceptable.

What Would You Do?

Q: My friend works for a pediatrician's office and is seeking services for his son. He was wondering if he could move up higher on the waitlist if he could get his office to increase referrals to our organization.

A: While we hope to have availability to provide services for your friend's son in the near future, we cannot and will not accept bribes in exchange for favors or services. We certainly hope he will contact our Intake team to begin the assessment process as our other clients do!

c. Client Referrals

Two overarching principles govern our interactions with referral sources:

- 1.** We do not pay for referrals. We accept client referrals and admissions based on clients' medical needs and our ability to render the needed services. We do not directly or indirectly give or offer anything of value in exchange for client referrals.
- 2.** We do not accept payments for referrals or authorizations to accept clients. Neither person acting on Kadiant's behalf is permitted to directly or indirectly solicit or receive anything of value in exchange for a client referral or authorization to accept a client.

What Would You Do?

Q: My family is so thankful for our team members! With the holidays coming up, we would like to give them a gift just like their teachers at school. What would be an appropriate gift?

A: Our team members are incredible individuals, and we are so thankful for the remarkable service that they provide. As professionals providing a service, we cannot ethically accept (or give) gifts. Instead, please consider providing a note or letter to include in their performance reviews, or leave a note at feedback@kadiant.com so that we can formally recognize them for their work!

d. Know the Rules About Gifts, Hospitality, and Entertainment

We don't give or receive anything that is inappropriate. That's why Kadiant has guidelines in place – to identify the circumstances under which an offer is okay and when it's not. Kadiant team members may not accept any gifts from, or give any gifts to, caregivers or clients. Gifts include, but are not limited to: gift cards, food/drink (other than water), clothing, tickets to events, housing, vehicles, or any other tangible or financial item exchanged outside the scope of a contract of services. Make sure you follow the rules and are aware of any special restrictions.

e. Fair Competition and Antitrust Regulations

We outperform our competition fairly and honestly. Kadiant believes in providing quality services in the communities we serve and letting free, fair, and open competition drive success or failure. We succeed based on our own merits and avoid any conduct that could restrict our or our competitors' ability to provide access to services.

Becoming aware of competitive information may be normal based on your role or responsibility at Kadiant, but make sure you treat that information ethically and lawfully. Compete fairly, but vigorously, and never use deception or misrepresentation or abuse confidential information to gain an unfair advantage of our competitors. When you talk with clients, provide only truthful information about the quality, features, and availability of our services.

Antitrust laws encourage free competition by prohibiting certain agreements and conduct that make it more difficult for companies to compete. Kadiant complies with all applicable federal and state antitrust laws. Violating an antitrust law is a serious matter and can result in prison time for team members and large financial penalties and reputational damage for Kadiant. Team members should not agree or attempt to agree with a competitor to artificially set prices or salaries, divide markets, restrict services, block new competitors from the market, share information on reimbursement rates or employee salaries that is not normally

available to the public, deny team member privileges to qualified practitioners, or agree to or participate with competitors in a boycott of government programs, insurance companies, or particular drugs or products.

Team members should pay attention to meetings with competitors, trade association meetings and trade shows to avoid the appearance of any anti-competitive behavior. If you find yourself in a questionable discussion, voice your concern, end the discussion, leave the meeting and promptly inform the Kadiant compliance team.

f. Don't Trade on Inside Information

We recognize that trading based on material, nonpublic (or "inside") information is not only unfair, it's illegal. As team members and directors of Kadiant, we may be aware of information about our organization, or companies with which we work, that isn't known by the public but, if it were, might influence someone to buy, sell, or hold stock. That knowledge makes us "insiders," and trading on this "inside" information is against the law.

Know the kinds of information considered inside information. Examples include nonpublic information about mergers or acquisitions, sales or earnings results, financial forecasts, changes to the executive leadership team, pending lawsuits or major wins or losses.



g. External Communications

MARKETING PRACTICES

Our ethics are core to the perception and value of our brand. Marketing materials and practices in no way mislead the public or misrepresent our ability to provide services. We do not claim any service outcomes unless represented by valid and reliable outcome data and/or research studies. We utilize clear and consistent methods of communicating information to consumers, family members, third-party entities, referral sources, funding sources, and community members, and exhibit sensitivity to the educational and reading levels of all persons when distributing information.

We adhere to the highest standard of ethical conduct in all marketing activities, including the following:

- ✔ Only appropriate and respectful representations of individuals and families we support that would not be exploitative in any way
- ✔ Strict adherence to organization policies in respect of confidentiality, informed consent, and conflict of interest

Coordinate marketing activities with the Marketing team to ensure you are following our applicable standards.

MEDIA CONTACTS & ADVERTISING

Our team members accurately and honestly represent themselves and our services. Team members will be honest and truthful in all marketing and advertising practices pertaining to the business practices of our service delivery system.

Our images on social media, materials and website will never include clients or their families. We will include this disclaimer on printed materials and on our website.

TESTIMONIALS

- ✔ We will never solicit testimonials from current clients or caregivers.
- ✔ We will only use testimonials from past clients, caregivers, and funding sources. Any solicited testimonials from past clients or caregivers will include disclosure of solicitation.
- ✔ Providers of testimonials will review and agree to the testimonial before it is shared with the public (events, materials, sites such as LinkedIn and Facebook).
- ✔ We will never disclose personal information or images without explicit written consent from the person providing the testimonial.

PUBLIC CONTENT

- ✔ We will only share content from reputable sites after verifying the content aligns with our clinical standards.
- ✔ We will actively monitor comments and respond to negative and false information in an accurate and thoughtful manner. We reserve the right to flag and remove repeat offenders.
- ✔ We will share aggregated outcome data to educate stakeholders on our approach to intervention and clearly define the outcomes and methodology used.

**EXTERNAL COMMUNICATIONS
BY TEAM MEMBERS ON
BEHALF OF KADIANT**

Occasionally, team members may be contacted by outside sources requesting information about organization matters, including information regarding current or former team members, organization projects or other workplace issues. In order to avoid providing inaccurate or incomplete information to outside sources, and the possible negative exposure. Any team member contacted by any outside source regarding the organization should immediately contact marketing@kadiant.com or another appropriate member of the leadership team.

h. Keep Accurate Records

Integrity in our recordkeeping inspires trust. Our records – and our recordkeeping – help us to fulfill our commitments and prove our fulfillment of those commitments. Clear and complete records document our effort and enable us to stand by the accuracy and quality of everything we do, and especially our client care. Complete and accurate records are critical organization assets.

Each of us has an obligation to follow all internal controls in recording and maintaining Kadiant's books and records, including client medical records. In every transaction, whether you are complying with audit requirements, preparing a financial statement or simply completing a timesheet, be honest, accurate and complete. Be alert for any suspicious transactions – know your clients, stakeholders and partners and understand their use of our services to prevent any fraud.

You also have a responsibility to know and follow our records retention policies. Take care never to dispose of information that may be relevant or required for any future purpose. For more information, please refer to Kadiant's Record Retention Policy and accompanying Standard.



i. Follow Industry Guidelines and Applicable Laws

At Kadiant, we always comply with the laws that govern our team member credentials and licenses or services, including Behavior Analysts and ABA services. As a California-based organization providing services nationwide, it is critical that we know and follow the laws that govern our services in all communities that we serve. If you provide services across state or county lines, make sure you know and comply with the requirements associated with the states and counties in which you serve. Be aware that the laws of more than one state or county may apply. We also comply with federal, state, and local laws and regulations as appropriate, as well as the Generally Accepted Accounting Principles (GAAP).

We Safeguard Our Organization

a. Protect Our Assets

We're good stewards of our physical, electronic and information assets. Each of us is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste, and improper use. Physical and electronic assets such as furniture, equipment, tools, inventory, computer hardware and software may be provided for you to do your job. Kadiant-owned electronic communication systems and equipment should be used for the purpose of facilitating Kadiant business. Infrequent personal use of assets such as phones, computers, emails, and the Internet is permitted, but make sure your use does not interfere with work (yours or anyone else's) and does not violate our policies or the law.

Be aware that anything you write down, send, download, or store on our systems is Kadiant property, and we may monitor your use – you shouldn't have any expectation of personal privacy when using our systems, electronic or physical. Kadiant reserves the right to monitor the use of all electronic communication systems and organization equipment including, but not limited to, internet usage, voicemail, and electronic mail. Please refer to the Acceptable Use of Information Technology Policy for additional information regarding usage of Kadiant's internet connection, network, and equipment. We want to avoid inappropriate or illegal internet use that creates risks for Kadiant's reputation.

Confidential information and intellectual property represent the outcome of significant organization investment and years of hard work. When you protect business plans, databases, client information, etc. you are protecting our future.

b. Avoid Conflicts of Interest

We don't let personal or clinical interests affect business decisions we make on behalf of Kadiant. It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise, and being able to recognize a potential conflict can help you avoid one.

For example:

- ✓ Acting as a consultant, advisor, employee or independent contractor, investor, or in any other capacity, of/with a Kadiant competitor, client or vendor
- ✓ Engaging in multiple and/or exploitative relationships
- ✓ Receiving payment, either directly or indirectly, for referring certain clients for clinical services
- ✓ Using any organization assets or resources for personal gain

When making decisions related to Kadiant, you have a duty to act in our organization's best interests and avoid even the appearance of a conflict. If you discover that a personal activity, investment, interest, or association could compromise – or even appear to compromise – your objectivity or your ability to make impartial business decisions, disclose it immediately to your immediate supervisor, People Org or the Compliance Team. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed. For more information, please refer to Kadiant's Conflicts of Interest Standard.



We are Good Corporate Citizens

a. Protect Our Reputation

Kadiant's distinguished reputation working with individuals on the autism spectrum has been earned through the combined efforts of our team members and the foundation established by our legacy organizations. Maintaining and protecting that reputation depends directly on our actions and the integrity with which we conduct our work.

DON'T SPEAK ON BEHALF OF KADIANT

We make sure that information shared about Kadiant is consistent, accurate, and complete. When you consider the power of words, the number of ways that words can be shared and the impact those words can have on a trusted organization like ours, you begin to understand the value of sending one clear message.

In order to ensure that accurate and complete information is conveyed to the public, we have designated individuals to serve as our official media spokespersons. Unless you are authorized to do so, do not make any public statements or communicate on Kadiant's behalf, especially if the media contacts you via social media or other personal channels. Communication includes relaying information in any form, including but not limited to print advertising, publications, flyers, Web-based media, radio, television, press releases, interviews, electronic advertisements, and our website. In addition, if you are on your personal accounts – social, digital or in person – we ask that you do not represent yourself as a Kadiant spokesperson.

All types of external communications must be reviewed and approved by the Marketing Team. Some materials, depending on their content and the audience, may also need to be reviewed by the Chief Compliance Officer to ensure that they have been approved by applicable federal and state agencies. It is also important that you do not photocopy any type of copy-written materials that have been produced outside of Kadiant and give them to clients or funding sources without copyright permission from the publisher.



What Would You Do?

Q: I had an awesome session with my client this afternoon! They even drew a picture of a rainbow and signed their name for the first time. I love what I do and would love to show my friends and family the progress my client has made. Can I post a picture of the drawing to Instagram to share this progress?

A: It is wonderful to hear about your client's progress! While team members are not permitted to post information about their clients to social media, we love the idea of celebrating these moments. Consider celebrating this success with the client's team or submitting a summary without identifying information to Kadiant at large!



b. Government Investigation and Funding Source Audits

Team members shall cooperate fully with appropriately authorized governmental investigations and funding source audits. Kadiant will respond in an orderly fashion to the government's or funding source's request for information through team member interviews and documentation review, in a manner that enables us to protect both the organization and client's interests, while cooperating fully with the investigation.

When a representative from a federal or state agency or funding source contacts one of our team members for information regarding Kadiant, or one of our clients, caregivers, or any other related entities, please immediately contact the Chief Compliance Officer.

Follow the Compliance team instructions and ask to see the government or funding source representative's identification and business card, if the representative presents in person. Do not provide any information until identification is verified and you have support from our Compliance team.

What Would You Do?

Q: I noticed that my team member is consistently 5 minutes late, but their session note start time is not changing. What's next?

A: We are committed to integrity in our billing. These claims will be reviewed, and if errors are found, corrected claims will be submitted immediately.

c. Preventing Fraud, Waste, and Abuse (FWA)

Fraud, waste and/or abuse are special types of potential compliance issues. Kadiant and its team members are obligated to report any FWA issues we see in our day-to-day jobs. FWA can be committed by providers, health plans, our clients, and/or our team members.

Fraud: An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to themselves or some other person. It includes any act that constitutes fraud under applicable federal or state law. Notably, team members have been terminated when they knowingly falsified their time worked.

Waste: Use of resources in a careless or needless manner.

Abuse: Practices that are inconsistent with sound fiscal, business or medical practices, and result in any unnecessary cost to third party funding sources and/or Kadiant programs.

d. Political Activity and Lobbying

Team members are free to participate in and contribute to political organizations or campaigns. You must, however, do so as an individual. You may not hold yourself out as a representative of Kadiant in any of these types of activities, nor may you get reimbursed by Kadiant for anything related to these activities. While Kadiant has contacts and dealings with governmental entities, our efforts are focused in our areas of expertise and consist of the provision of behavioral health services.



We are Good Global Citizens

a. Be a Good Steward

In the challenges that face our planet, we aspire to be part of the solution and recognize we have a responsibility to allocate our limited resources in a manner consistent with our commitment to our mission. Stewardship should not be limited only to how we allocate resources and manage the "bottom line." We promote a just culture: one with integrity, honesty, equity, inclusiveness, fairness, basic human rights, and concern for the common good. Kadiant also understands that the consideration of these things is better understood in conjunction with one another than in isolation.

b. Share Kindness and Make a Difference

Together, we shine bright! Kadiant makes a concerted effort to educate our community and enhance the lives of the communities we serve. We encourage team members to make a difference on a personal level. We support your personal choice to participate in charitable or political activities on a volunteer basis, but in general, ask that you do so on your own time and at your own expense, making sure your activities are lawful and consistent with our policies and values. Unless you receive approval in advance, do not use or donate Kadiant funds or assets to further your personal volunteer activities.

We Invest our Energy in our Collective Future

Reputations are hard to earn and easy to lose, and we are all in this together. When we talk about building the organization that we all want to work for, we mean working with our team members and business partners to demonstrate our core values every day. We hold ourselves and each other accountable to building an ethical foundation that builds trust. Do everything you can to enable people to live their absolute best lives and live our values every day.

If you have any questions about our Code or our policies, please contact our Chief Compliance Officer.



Team Member Acknowledgment

By signing this Acknowledgment, I acknowledge that:

1. I understand that this Acknowledgment is a condition of my employment with Kadiant.
2. I have received a copy of the Code of Conduct.
3. I have read and understand the Code of Conduct.
4. I will comply with the Code of Conduct.

Signature _____

Date _____

Print Name _____