

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

Standards of Conduct

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I STATEMENT OF PURPOSE

The Susquehanna Community Health and Dental Clinic, Inc. d/b/a River Valley Health and Dental Center (“RVH&DC”) is organized and operated exclusively for charitable purposes under the Pennsylvania Nonprofit Corporations Law and within the meaning of Section 501(c)(3) of the Internal Revenue Code (“Code”) as amended.

To carry out its mission, it is essential that the RVH&DC, its Board members, directors, officers, and all employees (including agents, contractors, and business associates) conduct themselves and the business affairs of the organization with honesty, integrity, and high ethical standards and in compliance with all applicable laws and regulations in furtherance of, and consistent with, the best interest of RVH&DC patients and the community that it serves.

To promote and ensure appropriate conduct, the primary purpose of the Standards of Conduct is to safeguard our commitment and govern our conduct when making decisions which may affect our resolve. These Standards of Conduct are intended to be consistent with RVH&DC’s Bylaws, applicable Federal, State, and Local laws and regulations and existing RVH&DC policies which are incorporated herein for all purposes.

II SCOPE AND RESPONSIBILITY

These Standards of Conduct apply to directors, officers, employees, consultants, and any other parties (agents, business associates, volunteers, etc.) engaged in activities or otherwise involved in furtherance of the interest of RVH&DC, its mission or service to its patients and its community. Each is responsible for acting in a manner consistent with the Standards, with RVH&DC policies and procedures, and with generally accepted standards of professionalism, courtesy, and respect. Each is accountable for leadership to build and support the RVH&DC culture that fosters a safe workplace, values diversity, encourages communication, and respects ethical behavior.

III STANDARDS

a. Standard for Managing Conflicts of Interest

1. In order to ensure fair and objective decisions are made in the best interest of RVH&DC, all Directors, Officers, and Board members are expected to comply with the provisions of the RVH&DC Conflict of Interest Policy and with the DHHS regulations found at 45CFR Subsection 74.42, such policy and regulation being hereby incorporated herein for all purposes.

b. Standards for Managing Confidentiality of Information

1. Safeguards for the use and protection of proprietary business information, confidential or other protected information (such as Protected Health Information [“PHI”] as defined by 45 C.F.R. § 160.10) and prohibitions regarding the disclosure of such

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information are set forth in the RVH&DC's Confidentiality Policy and its related HIPAA Policy, hereby incorporated herein for all purposes.

c. Standards for Gifts/Gratuities

1. Prohibition

a. No Director, Board Member, or Officer may solicit or accept gifts, gratuities, favors, or anything of value, other than promotional materials of little or nominal value such as pens, calendars, mugs, and other items intended for wide distribution and not easily resold.

d. Procurement Standards

1. It is the policy of RVH&DC to conduct all procurement transactions in a manner to provide, to the maximum extent practical, open, and free competition. Awards, contracts, etc. will be made to the bidder who is most responsive to the requisition or solicitation and most advantageous to RVH&DC in terms of price, quality, and other factors. RVH&DC retains the right to reject any and all bids or offers when it is in its interest to do so.

e. Standards for Political Activities and Lobbying

1. Political Activities

a. Directors, Board members or officers may not use RVH&DC's name, facility, or any resources in connection with political campaign activities, nor may they engage in conduct that indicates that RVH&DC supports any political party or candidate.

2. Lobbying

a. No Federal grant or related funds may be used to support the cost of lobbying activities as defined variously in OMB Circular A-122, DHHS rules implementing the Byrd Amendment and DHHS appropriations riders.

f. Standards for Compliance with Laws, Regulations, etc.

1. Each person under this standard is expected to be familiar with the laws and regulations that apply to RVH&DC's business operations. RVH&DC's Compliance Plan and Policy sets forth the standards to prevent, detect, and correct violations of law and Company policies and procedures which are hereby incorporated herein for all purposes, including the appointment of a compliance officer, who will be also responsible to ensure adherence to the Standards of Conduct as set forth herein.

2. Prohibition of Harassment

It is the policy of RVH&DC that all persons herein are to be guided by the highest ethical and professional standards and expected to behave with integrity and respect towards all that they come in contact with. Harassment is an improper or unwelcome conduct that might reasonably be expected or perceived to cause offense or humiliation to another person. Harassment in any form is prohibited and will not be tolerated. Sexual harassment is a specific type of prohibited conduct that is of a sexual nature. The proscription of this conduct in this Standard supplements and does not affect the application of other policies, regulations, rules, and laws applicable to this conduct.

3. Diversity & Inclusion

RVH&DC is an equal opportunity employer, and we aim to create a safe, respectful, and inclusive place of work for the betterment, health, and welfare of our community and workforce. We encourage and model that behavior and accountability to reinforce respect of all at all levels of our organization. This commitment to diversity and inclusion applies to all interactions in our shared professional encounters, including daily operations, shared

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online actions, and other events where each may represent RVH&DC. We denounce exclusionary behaviors, which may include incivility, bullying, and workplace violence, discrimination, and isolation of individuals and/or groups who are perceived as different while encouraging inclusive behaviors that would promote diversity.

IV Violations and Reporting Violations

1. All suspected or known violations of the Standards of Conduct should be reported promptly through regular reporting channels or directly to the Ethics/Compliance Officer, Karla Sexton at 570-567-5413. No reprisals or retaliation will be permitted against anyone for reporting in good faith a suspected or known violation. To the extent possible and if requested, the confidentiality of the source will be protected.

2. Violations by employees, etc. are subject to disciplinary action up to and including discharge pursuant to the RVH&DC's Disciplinary Action Policy, incorporated herein for all purposes. Directors, Board members, and Officers who violate these standards may, depending on the severity of the violations, be subject to admonishment or removal from the Board, in addition to legal penalties that may apply.

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