

# Compliance Program

## Major Components of Compliance Program

1. Code of Conduct
2. Code Of ethics
3. Conflict of Interest

### Objectives of Program

Ensure compliance with all applicable laws, regulations and PHI policies. As well as

- Promote operational excellence
- Preserve and promote PHI values
- Promote enhanced culture of trust while improving accountability and integrity

PHI Agency Director is the compliance officer and as such is responsible overall for the program. Any potential or known violations of the compliance program should be reported to the compliance officer. Anonymous reports will be investigated thoroughly as well. PHI requires employees to report any known or potential violations of law, regulations or PHI policies to the Compliance officer. Management will respond appropriately and promptly when violations are identified. Disciplinary action will occur as appropriate. PHI will determine if violations are related to gaps in policies, company practices or internal controls. PHI will take appropriate actions to prevent future violations.

## O-2-126 Code of Conduct

### Policy

The agency is committed to providing a safe and welcoming environment for all employees and clients. To promote safety and comfort for all, the agency asks individuals to act appropriately at all times when they are in the agency offices or other service locations. Policy is applicable to all agency staff and representatives.

### Guidelines

Employees are expected to behave in a mature and responsible way and to respect the rights and dignity of others. The agency code of conduct does not permit language or any action that can hurt or frighten another person or that could affect operations. Specifically, this includes, but is not limited to:

- Any conduct or action that is contrary to established rules and regulations or detrimental to the best interest of the agency.
- Violations of the harassment policy including, but not limited to:
  - Angry or vulgar language including swearing, name-calling or shouting
  - Physical contact with another person in any angry or threatening way
  - Any demonstration of sexual activity or sexual conduct with another person
  - Harassment or intimidation by words, gestures, body language or any other menacing behavior
- Theft or behavior that results in the destruction of property.
- Carrying or concealing any weapons, devices or objects that may be used as weapons.
- Using or possessing illegal chemicals on agency property, in agency vehicles or at agency-sponsored programs.
- Inappropriate release of confidential information.
- Falsifying documents such as applications, resumes, time sheets, reports, clinical or personnel file documentation.
- Excessive tardiness or absenteeism greater than three unapproved occurrences per quarter.
- Inappropriate attire or grooming.
- Use of agency equipment, facilities, data or property for personal gain.
- Unsafe or inappropriate use of equipment and vehicles.

### Procedures

Employees are encouraged to be responsible for their personal comfort and safety and ask any person whose behavior threatens their comfort to stop such behavior. If an employee feels uncomfortable in confronting the person directly, they should report the behavior to a supervisor. Supervisors should contact the appropriate departmental director if they feel any employee action warrants disciplinary action.

## **O-2-127 Conflict of Interest**

### Policy

All agency employees will not engage in activities contrary to the agency's interest or in activities inconsistent with the responsibilities entrusted to them. In general, there is conflict whenever an employee achieves personal gain or incurs obligation to others at the expense of the agency. Such personal gain need not be direct and might include gain by employee's family members or other relatives. Guidelines  
The following list includes areas where a conflict of interest is likely to arise, but it is not meant to limit the areas where employees should exercise discretion:

- Personal benefit from any corporate transaction: sale, purchase, rental, or lease of property, employee services or supplying products.
- Receiving gifts, special payment or favors greater than a \$25.00 from an individual or organization that is providing goods or services to the Agency or receiving goods or services from the agency. At no time should an employee solicit, request or otherwise indicate gifts, payments, favors, etc., are expected.
- Misuse of proprietary company information, or confidential information not available to the public, for personal or others' gain. This would include client or employee mailing lists or any use of such information to the agency's disadvantage or the employee's or others' improper advantage.
- Use of agency resources to develop competitive programs for personal use or use by others.

### Procedures

The agency director is the corporate officer who determines whether any specific transaction, relationship or other situation represents a conflict of interest. If determined to be a conflict of interest employment can be terminated.