



STANDARDS OF CONDUCT

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Standards of Conduct for Medicalodges, Inc., and Affiliates

Dear Fellow Medicalodges, Inc. Employee:

Medicalodges is an organization which is entrusted with the health and well-being of thousands of clients and residents in our facilities. As part of our commitment to quality care, our employee owned company adopts the following Standards of Conduct for Medicalodges, Inc. employees and its Affiliates Employees in order to express our desire to maintain the highest ethical and moral standards.

Corporate Compliance and Ethics programs such as these are designed to demonstrate to government authorities that we have made a commitment to adhering to all relevant laws as a matter of everyday practice. If it were our decision, this document would only contain four simple words: "DO THE RIGHT THING," and expect and hold our employees to the highest possible ethical and moral behavior; however, it is not within our discretion to adopt such a simplistic plan.

The Board of Directors of Medicalodges, Inc., has endorsed this compliance and ethics program and is committed to compliance and to deterring fraud and abuse. The following, therefore, applies equally to all directors, officers, employees, and agents of Medicalodges and its affiliates. If you are a supervisor, you should insure that employees under your supervision thoroughly understand and adhere to these standards. Further, if you are a supervisor and someone reports suspicious activity to you, you must take immediate action on the report and not take action against the person who came forward or otherwise discourage your staff from coming forward.

If you violate any of the policies and standards set forth in this document, you place not only your Company at risk for certain civil liability and criminal penalties but also yourself. Therefore, if you violate any of these policies, you subject yourself to discipline, including termination. If you do not understand any part of these standards, you should immediately contact your supervisor. Supervisors who are unable to respond should forward any and all questions to their supervisors to guarantee that any legal or ethical questions are fully and correctly addressed and answered.

The employee-owners of Medicalodges are committed to compliance with the legal regulatory issues that face us on a daily basis. I hope that the following assists each and every one of us to provide quality care to the frail and elderly who are entrusted to our care.

Respectfully,

Garen Cox, President, CEO,
and General Counsel

Contacts and Important Telephone Numbers

If you have any questions concerning any standard contained in this booklet, or if you are aware of an actual or potential violation of any policy or law, the first person you should contact is your immediate supervisor, your department head, administrator, or the Corporate Compliance Committee.

Any supervisor, department head, or administrator who has been alerted to any actual or potential violation of any policy or law should immediately act upon such information and, if appropriate, immediately notify the compliance committee of such problem.

If anyone becomes aware of fraudulent activity on the part of any employee, vendor, or affiliate of the Company, you should immediately contact a member of the Corporate Compliance Committee.

If you feel that any of the above individuals have not fully addressed your concerns or information or if circumstances make it difficult to discuss it with them, you should contact:

- 1) The Corporate compliance Committee
as identified at the end of this booklet

or

- 2) The Standards of Conduct "Hotline" at
Phone Number: 800.782.0120, extension 799381

To the maximum extent possible, Medicalodges will protect the confidentiality of persons who report possible misconduct. We may be unable to properly investigate allegations that are made anonymously.

PLEASE REMEMBER: THE INTENTIONAL MAKING OF A FALSE REPORT THAT A PERSON HAS BREACHED THESE STANDARDS IS A BREACH OF THE STANDARD AND MAY CONSTITUTE DEFAMATION.

ALSO REMEMBER THAT MEDICALODGES HAS DETAILED PERSONNEL POLICIES WHICH YOU MAY REQUEST FROM YOUR SUPERVISOR. THE PERSONNEL POLICIES SERVE TO SUPPLEMENT AND EXPAND ON THIS STANDARDS OF CONDUCT. ANY CONFLICTS BETWEEN THIS STANDARDS OF CONDUCT AND MEDICALDOGES' PERSONNEL POLICIES SHALL BE INTERPRETED IN FAVOR OF THE MEDICALODGES, INC'S., PERSONNEL POLICIES IN PLACE.

Abuse of Residents

Our residents and clients are our most important asset. These individuals are the reason Medicalodges is in business and the reason for our employees.

Because we value the health and well-being of our residents and clients, any abuse and/or neglect of those individuals is a serious matter that will be handled in a swift and deliberate manner.

Physical abuse, verbal abuse, neglect, and/or exploitation of any resident is expressly prohibited and must be reported by any person to his/her supervisor or administrator. All employees are to avoid any action, or failure to act, that might be construed as resident abuse and/or neglect.

Additionally, any employee that has reason to believe a crime has been committed against any resident is required by the Elder Justice Act to report the crime to the proper authorities. Your supervisor and/or Administrator can help you file the report.

Any employee, who after consideration of the circumstances of any act, is subject to suspension without pay and/or termination, or any other disciplinary action deemed appropriate.

If the preliminary investigation gives cause to believe that abuse, neglect, or exploitation may have occurred, the administrator will immediately notify the appropriate state agency; and the offending employee will not be eligible for rehire at any other Medicalodge facility.

Accuracy of Medical Records and Books/False Claims

In all businesses, accurate books and records are critical. Medicalodges and Affiliates file numerous medical records, claims, and documents which include government payments; and it is vitally important all information submitted be correct and accurate. We will not tolerate any inaccurate, false, misleading, altered, incomplete, or careless recordkeeping. This rule applies to every facet of our business. Employees should realize that the making of a false statement on Company medical or other records could lead to civil liability or criminal prosecution of the Company, the employee involved, and coworkers.

Accurate medical and business records are vital to the Company since they are an essential element to business planning. Secondly, outside parties rely on the accuracy of the records and could hold us liable for any false or misleading information contained in such documentation.

Medicalodges and affiliates have a zero tolerance policy for falsification or alteration of medical or corporate records. In addition, if you see any of your fellow workers engaging in what may be falsification or alteration of medical or corporate records, inform your supervisor immediately. By doing so, you will be acting in the best interest of the Company you own.

Antitrust

Medicalodges and Affiliates will comply strictly with U.S. Antitrust laws. We will not engage in activity that restrains free and fair competition.

The following lists some of the activities that the U.S. Antitrust law prohibits:

- price fixing agreements, such as agreements to fix servicing fees;
- customer or supplier boycotts;
- agreements to apportion markets;
- disparaging competitors; and
- exchanging information regarding prices or fees.

With this in mind, you should adhere to the following rules:

- 1) Do not initiate any discussion with a competitor that in any way touches upon the above activities, even in very general terms.
- 2) If one of our competitors contacts you regarding a prohibited activity, stop the conversation immediately and contact the Corporate Compliance Officer.
- 3) In all situations when you come into contact with representatives from our competitors, be careful what you say. In particular, you should exercise good judgment and discretion at trade association and professional activity meetings.

Antitrust laws are highly complex. You should, therefore, contact the Corporate Legal Department whenever you have a concern that may involve this area of law.

Attorney-Client Privilege

To encourage candor and openness in seeking and providing legal advice, the law recognizes attorney-client privilege which shields communications between Medicalodges, Inc. and Affiliates employees and its attorney from disclosure in connection with litigation.

To maintain this privilege, communications to and from Medicalodges' attorneys for the purpose of seeking or giving legal advice must not be disclosed to others unless authorized by Medicalodges' attorneys.

Auditing and Monitoring

Medicalodges conducts audits of its financial and operational status on a regular basis both by internal audits and outside auditors acting without any interferences or influence by the Company. These outside auditors are from both the public and private sectors.

Efforts are made to insure the accuracy and completeness of such audits, and recommendations are made which are acted upon after review of the information generated from these reports.

If anyone suspects any act of fraud or misrepresentation by the Company in the financial aspects of the Company or, in the alternative, any billing procedure which results in the overcharging of any resident or of any federal program such as Medicaid and/or Medicare, we ask that you immediately contact the Corporate Legal Department or Corporate Compliance Officer to report such activity.

Background Screening

State and federal laws prohibit Medicalodges, Inc., and/or its affiliates from hiring employees if it knows or should have known the individual has engaged in certain illegal activities. Therefore, criminal background checks are conducted on all potential employees and volunteers in accordance with state and federal laws. In addition, for employees in a position to be certified for participation in the Medicaid and/or Medicare program, Medicalodges, Inc., and/or its affiliates investigates the Medicaid/Medicare certification status of those employees. Medicalodges, Inc., and/or its affiliates also investigates with other licensing and related bodies, including the nurse registry for the state involved, to ensure that prospective employees currently have the licensing or other status required to be employed by Medicalodges, Inc., and/or its affiliates. Medicalodges, Inc., and/or its affiliates treats all individuals as conditional employees and, should a background check indicate certain criminal activity, Medicalodges, Inc., and/or its affiliates shall immediately terminate the employment of the subject employee.

Billing for Services

Medicalodges strive to maintain accurate procedures for documentation in billing, vendor agreements, medical necessity, and discharge and transfer rules. With the advent of the Prospective Payment System (PPS) and the classification of Medicare residents into Resource Utilization Groups (RUGs), it is vitally important that proper handling of our residents' care occurs to insure that billing errors to residents and to Medicare and Medicaid agencies do not develop.

To insure accuracy, the medical director of the facility is required to work closely with the facility to verify the necessity of all treatments and therapies. Anyone with information concerning either unintentional or intentional billing errors or the providing of medical services without the necessity for such service should immediately convey this information to the Corporate Compliance Officer.

Business Courtesies and Gifts

Gifts or favors should not be offered to or accepted from clients, potential clients, residents, family, friends, visitors, or anyone with whom Medicalodges and its affiliates does business.

Under no circumstances should you accept any bribes or kickbacks from vendors or suppliers. This may constitute criminal activity.

These rules do not cover every eventuality. If you are unsure whether a specific gift or entertainment offer lies within the bounds of acceptable business practices, ask yourself:

- Is it clearly related to our business?
- Is it reasonable and in good taste?
- Do I feel pressure to reciprocate by giving the third party business? Or conversely, am I putting pressure on someone else to close a deal or work with Medicalodges, Inc. and/or an affiliate?
- Will I be comfortable if the situation becomes public knowledge?

Computer Software and E-Mail

Apart from authorized backups that are allowed by a license agreement, you should not make copies of any third party computer programs. Also, you may not remove any copyrighted computer software from any facility owned and operated by Medicalodges.

Medicalodges provides its employees with E-mail to be used for business purposes only. The corporation may from time to time publish policies on limited personal use of E-mail, and you are responsible for knowing and conforming to these policies. It should be recognized that there is no expectation of privacy with E-mail. Moreover, unlike an oral conversation, E-mail can be permanently recorded. If you send an E-mail, expect that the recipient will print it or forward it to others. Also, your messages remain on back-up tapes on Medicalodges' computers.

Sending E-mail that is in any fashion obscene or harassing is strictly prohibited. In addition, because Medicalodges has provided its employees with an E-mail system for their business use only, the Company reserves the right to audit E-mail communications of its employees.

Confidential Information and Resident Records

Medicalodges and its Affiliates expect our employees to safeguard confidential information about Medicalodges and the residents and clients it serves. Accordingly, our employees should not disclose such confidential information to unauthorized parties.

We are particularly concerned over the confidentiality of medical information of our residents and clients who reside in our facilities and entrust their health care to us. Confidential information also consists of financial information about your company as well as personnel records and information relating to employees as well as pending or threatened litigation.

We have the following specific rules regarding the protection of confidential information:

- 1) No Medicalodges' or affiliate employee may access a resident or client medical record unless necessary to do so for a legitimate health care related purpose and authorized by law, regulation, or Company policy.
- 2) Disclosures of confidential information from third parties can also lead to legal exposure and potential embarrassment. Therefore, be sure any information you accept from a third party is used only for treatment, payment or healthcare operations.
- 3) No Medicalodges' employee shall use Medicalodges' confidential information for personal advantage.
- 4) After leaving employment with Medicalodges, a former employee maintains an obligation not to disclose confidential information obtained by the employee either relating to health care, employment, or business.
- 5) Employees should not attempt to gain access to information or any other automated computer system for which access has not been authorized.
- 6) Public or press inquiries should be directed to the corporate offices and disseminated only by those designated officers of Medicalodges, Inc.
- 7) Confidential information should not be discussed with friends or family or in public places.

Conflicts of Interest/Outside Employment

A conflict of interest arises when your personal situation clouds your judgment and renders you unable to act in the best interest of Medicalodges and Affiliates. An apparent conflict occurs when your personal interests have the potential to interfere with your ability to exercise your judgment fairly.

As an employee, you must avoid conflicts of interest. Before you engage in any activity that could possibly pose a conflict, you must have the activity approved in advance by your supervisor.

Accordingly, you must adhere to the following rules regarding conflicts of interest:

- 1) Inform your supervisor of any family or personal relationship that might influence or appear to influence your judgment when acting as an employee.
- 2) You cannot accept payment from any other source for work you do at Medicalodges or an Affiliate.
- 3) You cannot be employed outside of Medicalodges or an Affiliate if such a position interferes with your work. Please contact your supervisor with any questions regarding this policy.

Discipline and Sanctions

It is our expectation that everyone affiliated with Medicalodges will adhere to these Standards of Conduct. Any employee violating any provision of the Standards of Conduct will be subject to serious disciplinary action but Medicalodges will pursue legal action against offending employees and other individuals involved. In some cases, Medicalodges may have a legal or ethical obligation to call violations to the attention of appropriate enforcement authorities.

Employees who contact the Toll Free Number for Medicalodges to report concerns, including allegations of violations of the False Claims Act, will not be subject to discipline or retaliation if the allegation is brought in good faith. On the other hand, any employee who deliberately makes a false accusation with the sole purpose of harming or retaliating against another employee will be subject to disciplinary action.

Drugs, Alcohol and Firearms

It is the policy of Medicalodges and Affiliates to promote the safety and well-being of its employees and, since we are responsible for the well-being and lives of those individuals who may not be able to care for themselves, we hereby establish and will maintain a healthy environment in the facilities of Medicalodges and its affiliates. Accordingly, our work environment must be free from substance abuse and weapons.

To protect our residents, “drug testing” may occur to insure compliance.

The following rules apply:

- 1) No alcoholic beverages may be consumed on Company premises.
- 2) All persons are prohibited from being under the influence of alcohol or illegal drugs while on Medicalodges’ premises or while performing official business for Medicalodges or when in public or private transportation going to or from locations in relation to their employment with Medicalodges or its affiliates.
- 3) The sale, possession, transfer, or purchase of alcohol or illegal drugs on Company property or while performing Company business is prohibited.
- 4) Firearms or other weapons are prohibited on Company premises. However, this prohibition does not prevent an employee with a concealed carry handgun license from storing a handgun inside a locked vehicle that is parked or driven on Company property.

Any employee violating any provision relating to the use, sale or transportation of alcohol or drugs as set out above may be subject to immediate termination. The supervisors may take such matters as length of employment, job responsibilities, etc., into consideration to decide if such employment shall be terminated or the employee allowed to complete a recognized alcohol or drug treatment program (at the employee’s sole expense) and return after successful completion of the program. Any such decision of the supervisory personnel shall be solely at the discretion of the supervisors.

Any violation of having or possessing a firearm or other weapon may be grounds for immediate termination from employment.

Employment and Equal Opportunity

Medicalodges and Affiliates are an “at will” employer. This means you are free to leave your job at any time and for any reason. Conversely, Medicalodges is free to terminate your employment at any time for any legal reason.

It is our policy to provide equal opportunity for all in accordance with all applicable federal, state, and local laws regarding equal employment.

All Medicalodges’ and Affiliate employees deserve to be treated with respect. Accordingly, employees must not engage in degrading or humiliating jokes, slurs, intimidation, or other harassing conduct towards others.

Our equal opportunity policy applies to all employees and prospective employees. It extends to all facets of our relationship with employees, including recruitment, compensation, benefits, relocation, training, and other terms and conditions of employment. If you have any concerns regarding our equal opportunity policy, you should contact your supervisor, or, if you prefer, the Corporate Compliance Committee.

Employment of Close Relatives

Medicalodges and Affiliates want to ensure that we have a fair and impartial workplace. Therefore, although we believe there are many positive aspects to having related persons and families working at Medicalodges, we have several specific guidelines relating to the employment of relatives. These policies are spelled out in detail in the Medicalodges personnel policies applicable to your individual facility. You should closely review the provisions contained in our policies and procedures.

Fraud and Theft

It is Medicalodges' and Affiliates policy to promptly investigate suspected cases of fraud or theft. If you suspect or detect any fraudulent activity, immediately report it to your supervisor or Corporate Compliance Officer.

Incidents of fraud and theft will be referred to criminal prosecution when appropriate. Efforts will be made to preserve the confidentiality of any information you provide.

The following guidelines should be observed if you are involved in this type of an investigation are as follows:

- 1) Do not attempt to investigate a suspected case of fraud or dishonesty and do not attempt to confront the suspected party.
- 2) Do not terminate an employee for fraud or dishonesty without first consulting the Corporate Compliance Officer and obtaining specific guidance and approval on how best to proceed.
- 3) Do not promise to forego reporting or threaten to report a crime to law enforcement authorities as a way to encourage the return of stolen funds or property.
- 4) Do contact the Corporate Compliance Officer regarding who has a "need to know" about the case, and limit your discussions accordingly.
- 5) Do not discuss the matter with others unless instructed to do so. Contact the Corporate Compliance Officer about how best to communicate with any law enforcement agency investigating or prosecuting a criminal complaint.

This standard covers any act of fraud or dishonesty including the theft of property and computer crime and acts perpetrated by outsiders.

Government Contracting

Medicalodges enters into contracts with federal and state government agencies. The laws and regulations relating to contracting with the government impose different and far more extensive requirements than those encountered with other clients or residents. Violations of these statutes and regulations could subject Medicalodges to fines, penalties, suspension from future contracts, and in some instances, criminal prosecution of either Medicalodges or individual employees.

Medicalodges requires:

- 1) Accurate and complete tracking and billing of all labor, supplies and materials costs;
- 2) Faithful and strict conformity to all contract specifications and requirements;
- 3) Compliance with all federal and state statutes and regulations, including the avoidance of fraudulent demands for payment of money or the transfer of property that could potentially violate the False Claims Act and compliance with the Anti-Kickback Act of 1986, whereby Medicalodges' employees are forbidden from offering, giving, transferring, or receiving anything of value, for personal or Medicalodges' benefit, to any official, employee, or agent of the federal government; and
- 4) Compliance with rules regarding hiring or soliciting employment of present or former government officials.

Government Investigations

Medicalodges and Affiliates policy is to cooperate fully with any appropriate government investigation, while at the same time protecting the legal rights of the corporation, our employees, and our clients and residents. Accordingly, if you or someone who reports to you is contacted by a government investigator who asks you for an interview, seeks information or access to our files, or tells you that Medicalodges and/or an Affiliate or an employee of Medicalodges and/or an Affiliate is under investigation, you should immediately contact the Corporate Legal Department.

In keeping with this policy:

- 1) Do not destroy any documents within Company possession or control if you expect those documents to be requested by the government or a court. The definition of document includes electronic media such as computer files and E-mail.
- 2) Never alter any Company records or documents and never alter or change any medical records of Medicalodges.
- 3) Never attempt to convince any other employee or other person to provide misleading or untrue information to government investigators.
- 4) If you receive a subpoena to testify in a legal proceeding concerning Medicalodges and/or Affiliate, or any other legal document, including legal documents requesting that you provide certain documents before a court or hearing officer, you are required to submit that document to the Corporate Legal Office immediately before any other action is taken. If you receive any other legal document in which you are unsure about how to proceed, contact the Corporate Legal Office.
- 5) If an investigator or lawyer for the government contacts you outside of the workplace, you are strongly encouraged to contact the Corporate Legal Office before responding. If you decide to speak to a government investigator, you should be entirely truthful.

Internal Audit

Audits of all corporate activities, including audits of compliance with this Standards of Business Conduct, are periodically performed by Medicalodges. All employees are required to cooperate fully with any such audits and provide complete, truthful, and accurate information.

Sexual Harassment

Medicalodges and Affiliates do not tolerate any form of sexual harassment. Sexual harassment is the initiation of unwelcome sexual advances or the solicitation of sexual favors by one employee with regard to another employee. Sexual harassment may also include other physical or verbal conduct that is sexually related. In addition, any activity that creates, encourages, or promotes a work environment that is adverse or hostile to a group or individual because of gender may be sexual harassment.

As an employee, we suggest you treat your co-workers on a gender-neutral basis. This means men and women who work for Medicalodges and/or Affiliates should treat one another with respect and courtesy without regard to whether they are of the same or different genders. For example, employees should recognize that remarks regarding physical appearance or dress may lead to misunderstandings and, therefore, should be avoided. For example, Employee "A" may feel they are paying Employee "B" a compliment, but Employee "B" feels uncomfortable due to Employee "A"'s comments, causing Employee "B" to complain they feel harassed.

For further detail, see Medicalodges and Affiliates Personnel Policies and Procedures. This Standard of Conduct applies to all forms of harassment, including race, color, religion, gender, national origin, ethnicity, age, genetic information, disability, veteran status or any other characteristic protected by state, local or federal law ("Protected Characteristics").

All complaints regarding harassment will be addressed promptly and discreetly.

Worker Fraternization

It is Medicalodges' and Affiliates policy that employees shall not engage in romantic relationships with other employees who are their supervisors or subordinates, or to whom they report or whom they supervise directly or indirectly.

Workplace Violence

Medicalodges wants each of our employees to feel safe at work. Workplace violence includes, but is not limited to, threats or threatening behavior. Intimidation, harassment, or assault will not be tolerated.

Questions to Ask Yourself when You Face a Tough Decision

Here are a few questions you should ask yourself if you are confronted with a situation that seems to involve ethical issues:

- 1) What is the purpose of the law, regulation, or Company policy or standard?
- 2) Would I want my actions reported on the evening news or in trade papers?
- 3) What would my friends and family think of my decision?
- 4) What will the direct and indirect consequences of my decision be for Medicalodges?
- 5) Even if I'm sure that my actions are proper, is there a risk they may appear to others as improper?

After asking yourself these questions, if you are still unsure about how to proceed, stop for a moment and seek assistance from the individuals listed on the insert page of this booklet.

Always think before you act. If you are told to do something you think or know is wrong, do not do it. Remember: You are responsible for your own actions.

If You're Unsure, Always Ask More Questions!!

Questions and Answers

General:

Q: If I have a question relating to the Standards of Conduct, who should I contact?

A: In many instances, you should contact your supervisor, department head, or administrator. In certain circumstances we realize this may not be practical or may be uncomfortable for you. Therefore, you may also contact any member of the Corporate Compliance Committee or the Corporate Compliance Officer. The back of this booklet contains a listing of relevant phone numbers.

Q: I think I saw a fellow employee commit a violation of these Standards of Conduct, but I'm not entirely sure. Will I get in trouble if I report what I know?

A: No. In fact, you are more likely to get into trouble if you do not report your suspicion. You are required to report possible violations. As long as you have a good faith believe that a violation occurred, you will not be subject to any discipline.

Q: I'm in a situation where making the correct decision would mean that the Company would lose money. Should I be ethical even if this means losses?

A: Yes. Our employees should act ethically at all times and in all circumstances. Our future plans are long term. Thus, you should never jeopardize Medicalodges' overall well-being for immediate financial gain.

Q: My supervisor gave me an order that I think requires me to violate the law. What should I do?

A: Refuse to follow the order and report the requested order. If you feel comfortable, tell your supervisor, department head, or administrator your concerns. If you are uncomfortable, contact the Corporate Compliance Committee.

Q: Are our consultants obligated to follow these Standards of Conduct?

A: Yes. Our consultants receive a copy of these Standards of Conduct when they sign their consulting agreements. These agreements state that consultants agree to abide by our Standards.

Q: I plan to review the medical files of one of our residents in order to fully prepare for their plan of care. May I take these files home since I can't find time at work to review their records?

A: No. Information contained in the facility concerning residents is completely confidential in nature. This includes any medical, financial, or social information concerning the residents or clients. No resident information of any type may be removed from Medicalodges facilities except with the written permission of an officer, a Clinical Nurse Consultant, or the Corporate Compliance Officer of Medicalodges.

Q: I think I'm being discriminated against because of my age. What should I do?

A: Contact your Corporate Compliance Officer. Medicalodges strictly adheres to all equal employment opportunity laws and, as such, does not discriminate on the basis of age.

Medicalodges, Inc. and Affiliates

Acknowledgement Form

By signing below, I acknowledge that I have read and understand Medicalodges and Affiliates Standards of Conduct. I understand and agree that I must comply with the Standards of Conduct and all laws, regulations, policies, procedures and other guidance applicable to the responsibilities of my position.

I acknowledge that Medicalodges and Affiliates maintains a hotline for the purpose of receiving notifications of possible violations of law, regulation and the Medicalodges Corporate Compliance and Ethics Program and Standards of conduct. I understand that failure to report any concerns regarding possible violations of law, regulations or the Corporate Compliance and Ethics Program may result in disciplinary action, up to and including termination.

Signature

Print Name

Title

Date