

1.3.1 CONFLICT OF INTEREST EMPLOYEES

Effective: 10/74

Revised: 04/14; 05/19; 05/23;

04/24

Reviewed/Approved by Bd. Of

Dir.: 04/24

Kirk Davis, President/CEO

Policy Statement:

Lakemary Center (LMC) is committed to conducting its business with integrity and in accordance with all federal, state, and local laws. Our commitment to ethical practice includes overarching principles that support our mission, values, and guiding principles.

Policy:

LMC's policy is to ensure all agents of LMC engage in ethical and lawful behavior in all aspects of LMC business. In the event any contrary behavior is discovered, it will be LMC's practice to immediately correct and bring the issue in line with LMC's commitment to ethical practice.

As part of its commitment to this policy, LMC has instituted a Corporate Compliance Program and Code of Conduct Plan. In addition to taking proactive and integrity-focused actions to ensure compliance, LMC further strives to prevent, detect, and discourage violations of the law, by providing guidance to LMC and its employees, agents (persons or entities under contract with LMC) and volunteers in resolving legal and ethical issues. All LMC personnel must comply with these standards and policies.

LMC employees are expected to engage in activities that promote the effective performance of their duties, and which would reflect positively on the reputation of LMC and the goodwill LMC experiences in the community. All contracts, including contracts entered into with employees, are awarded on the basis of competitive pricing and the expectation of quality outcomes.

The Corporate Compliance Committee (CCC) and the Corporate Compliance Officer (CCO) are responsible for implementing and monitoring the Corporate Compliance Program and Code of Conduct Plan. By formal resolution, the Board of Directors has delegated overall responsibility for the Corporate Compliance Program to the President/CEO. The President/CEO has formally designated the CCO and assigned committee membership. The CCO establishes and periodically reviews the Corporate Compliance Program and Code of Conduct procedures. The procedure is distributed and reviewed during New Employee Orientation (NEO). All employees sign an acknowledgement of understanding and intent to comply.

Policy reference: None

Procedure reference: Corporate Compliance Program and Code of Conduct Plan

Employee Handbook

Application: All services.