  <b>Corporate Compliance</b>	<b>Section III</b>  <i>Quality Assurance &amp; Compliance</i>	<b>3.4.1c</b>  <i>Code of Conduct</i>	<b>Page   1</b>
	<b>Approved By:</b> <u>Allen Connely</u> <b>Date:</b> <u>7/6/2023</u>		

## Code of Conduct

### Introduction

Challenge provides visible services in the community; therefore, Challenge employees must conduct themselves with great discretion in both their public and private life so that Challenge and its mission are not compromised. All employees are expected to serve as positive, professional role models for persons participating in Challenge services. Challenge employees will ensure that the rights and safety of persons participating in services are respected in all situations. Challenge expects the Board of Directors, interns, volunteers, contractors, and affiliates to present as positive, professional members of the Challenge community.

### Policy Statement

All employees, independent contractors, and board members must know, understand, and follow Challenge's Code of Conduct. The Code of Conduct is integral to Challenge's Corporate Compliance Program. It guides employees and assists Challenge in day-to-day activities within appropriate ethical and legal standards. Failure to adhere to the following standards of conduct may result in disciplinary action, including termination.


### Procedure

#### A. Employees

Employees are provided with a copy of the Code of Conduct at the time of hire and annually.

New employees are trained on the Code of Conduct within 30 days of hire and will sign an acknowledgment of the Code of Conduct at that time, indicating their understanding and commitment to follow the Code of Conduct.

Annually, employees will be required to review the Code of Conduct and sign an acknowledgment indicating their understanding and commitment to follow the Code of Conduct. Quality Assurance is responsible for ensuring that all employees have completed the acknowledgment.

  <b>Corporate Compliance</b>	<b>Section III</b>	<b>3.4.1c</b>	<b>Page   2</b>
	<i>Quality Assurance &amp; Compliance</i>	<i>Code of Conduct</i>	

## B. Managers

The management team is expected to set an example by following the Code of Conduct. All management employees are expected to:

- i. Exercise their responsibilities in a manner that is kind, sensitive, thoughtful, and respectful.
- ii. Create an environment where all employees feel free to raise concerns and propose ideas.
- iii. Ensure their employees have sufficient information to comply with laws, regulations, and policies and procedures, including but not limited to those related to the Corporate Compliance Program. Managers must create a culture in which the highest standards of ethics and compliance are promoted.

## C. Independent Contractors

Independent contractors are provided a copy of the Code of Conduct when entering a written agreement with Challenge.

Each independent contractor will sign an acknowledgment of the Code of Conduct at the time of the initial contract and each renewal, indicating their understanding and commitment to follow the Code of Conduct.

## D. Board Members


Each board member is provided a copy of the Code of Conduct at the time of Board orientation and upon renewal of the Board seat.

Each new board member will be oriented on the Code of Conduct within 90 days of joining Challenge's Board of Directors. The board member will sign an acknowledgment indicating their understanding and commitment to follow the Code of Conduct.

## General Principles

All Challenge employees, executive leadership, board of directors, contractors, and affiliates are to adhere to the following principles at all times:

- Always act with the highest standards of personal and professional integrity.
  - Do not tolerate others who attempt to deceive or evade responsibilities or actions.
- Keep the best interests of persons in service in mind at all times.
  - Do nothing that would compromise those best interests.

  <b>Corporate Compliance</b>	<b>Section III</b>	<b>3.4.1c</b>	<b>Page   3</b>
	<i>Quality Assurance &amp; Compliance</i>	<i>Code of Conduct</i>	

- Do not allow the pressure of others to compromise any actions.
- Consider the legality of any actions that might be taken and how they may affect the agency.
  - Challenge’s name and reputation are assets, and at all times, conduct must enhance the value of that asset.

### **Statement of Ethical Conduct**

Challenge is committed to the highest ethical standards. These standards are exhibited when interacting with customers, the community, funding agencies, and persons served. We avoid pursuing personal gain that conflicts with the interests of Challenge or the people we serve.

Challenge maintains an environment that fosters respect for the dignity of all people. We do not tolerate using a position of authority to influence others to perform inappropriate acts, abuse of power, or harassment. We comply with all rules, laws, and regulations that apply to us. We abide by all of Challenge’s policies and procedures.

We use Challenge's property and other resources for their intended purpose, for the good of the organization and the people we serve. We do not tolerate theft or misuse of company property for personal reasons.


We respect all confidential information to which we are exposed and use it only for its intended purpose. We protect Challenge’s proprietary information and access to Challenge facilities and computer systems. We protect the personal health information of the people we serve.

We report violations of any law, regulation, Challenge policy, or procedure to the appropriate party. We do not tolerate retaliation against any staff member who reports a violation.

### **Rules of Conduct**


Challenge believes specific rules of conduct must be followed to promote a positive and ethical work environment. All Challenge employees, executive leadership, board members, contractors, and affiliates must pledge to abide by the laws, regulations, and Challenge policies and procedures, including, but not limited to, those related to Challenge’s Corporate Compliance Program.

1. To work cooperatively and respectfully with all Challenge employees, executive leadership, board members, outside agencies, and the community to provide the highest quality of services.
2. To place the interests of the people engaged in Challenge services first and foremost in all day-to-day activities. To represent Challenge positively within the community.
3. To conduct all activities in a fiscally responsible manner.
4. To work in accordance with applicable laws, regulations, and Challenge policies.

  <b>Corporate Compliance</b>	<b>Section III</b>	<b>3.4.1c</b>	<b>Page   4</b>
	<i>Quality Assurance &amp; Compliance</i>	<i>Code of Conduct</i>	

5. To seek training and assistance in areas that would strengthen the ability to fulfill the position’s responsibilities.
6. Avoid conflicts of interest, including giving or receiving gifts.
7. To conserve Challenge resources and not engage in wasteful behavior.
8. To respect all confidential information encountered during job duties.
9. To complete tasks promptly and meet the expectations of quality work that Challenge strives to achieve.
10. To not discriminate against any person associated with Challenge for any reason, including race, religion, national origin, creed, age, sex, ethnic background, gender identity, intersex status, disability, or other barriers to employment.
11. To bill third-party payors accurately.
12. To report to a manager or the Compliance Hotline any potential violation of applicable laws, regulations, and policies, including the Corporate Compliance Program.
13. Respect the board and executive leadership's role and fully implement their decisions.
14. To consult Challenge leadership when questions arise regarding the conduct permitted under applicable laws, regulations, and policies, including the Corporate Compliance Program.

*The pages following include the Employee Code of Conduct Acknowledgment Form, the Independent Contractor Acknowledgment Form, and the Board of Directors Member Code of Conduct Acknowledgment Form,*

  <b>Corporate Compliance</b>	<b>Section III</b>	<b>3.4.1c</b>	<b>Page   5</b>
	<i>Quality Assurance &amp; Compliance</i>	<i>Code of Conduct</i>	

## Challenge Employee Code of Conduct Acknowledgment Form


- ✓ I acknowledge reading and understanding the Challenge Corporate Compliance Program and the Challenge Code of Conduct.
- ✓ I understand and agree that I must comply with the Challenge Corporate Compliance Program, the Code of Conduct, all laws, regulations, policies, procedures, and other guidance applicable to the responsibilities of my position.
- ✓ I agree to fully cooperate with implementing the Challenge Corporate Compliance Program, to participate in any audit or monitoring processes, and to report any possible violations of law, regulations, or policies that apply to Challenge of which I become aware.
- ✓ I acknowledge that Challenge maintains a hotline to receive notifications of possible violations of law, regulations, and the Challenge Corporate Compliance Program.
- ✓ I understand that my failure to report any concerns regarding possible violations of law, regulations, or the Corporate Compliance Program may result in disciplinary action, including termination.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

  <b>Corporate Compliance</b>	<b>Section III</b>	<b>3.4.1c</b>	<b>Page   6</b>
	<i>Quality Assurance &amp; Compliance</i>	<i>Code of Conduct</i>	

## Independent Contractor Code of Conduct Acknowledgment Form

Challenge’s Corporate Compliance Program states that the agency and its employees, executive leadership, board, contractors, and affiliates will adhere to applicable Federal and State laws, regulations, and Challenge policies and procedures.

Challenge’s Corporate Compliance Program is a combination of policy and procedure that assists the agency in monitoring, detecting, and correcting actions that do not comply with applicable laws, regulations, or Challenge policies and procedures.

As a contractor of Challenge, we expect you to act in compliance with laws that apply to our agency and your organization and in compliance with our policies and procedures, particularly the Code of Conduct, which establishes the overarching principles for conducting our business with integrity based on sound ethical and legal standards.


As a contractor of Challenge, we expect you to report any suspected or potential law violations or our policies and procedures, of which you may become aware by contacting our President/CEO, the Corporate Compliance Officer, or the Corporate Compliance Hotline.

President/CEO or Corporate Compliance Officer 1083 Waterloo Geneva Rd. Waterloo, NY 13165	President/CEO: 315-539-5067 Corporate Compliance Officer: 315-856-8164 Corporate Compliance Hotline: 315-856-8060
--	---

As a contractor of Challenge, we expect you to understand your role in Challenge’s Corporate Compliance Program, and we expect you to request any policies and procedures that apply to you and your organization. You may contact the President/CEO or the Corporate Compliance Officer for any questions or clarifications of your responsibilities.

.....

- ✓ I acknowledge on behalf of myself and my organization that I have read and understand the Challenge Code of Conduct and the policies and procedures of the Challenge Corporate Compliance Program that apply to the services my organization provides to Challenge.
- ✓ I understand and agree that I and all those in my organization who provide services to Challenge must comply with the Challenge Corporate Compliance Program, the

  <b>Corporate Compliance</b>	<b>Section III</b>	<b>3.4.1c</b>	<b>Page   7</b>
	<i>Quality Assurance &amp; Compliance</i>	<i>Code of Conduct</i>	

Challenge Code of Conduct, all laws, regulations, policies, procedures, and other guidance applicable to the services provided to Challenge.


- ✓ I agree on behalf of my organization to fully cooperate with implementing the Challenge Corporate Compliance Plan, to participate in any audit or monitoring processes, and to report any instances of possible violations of law, regulations, or policies that apply to Challenge of which I become aware.
- ✓ I acknowledge that Challenge maintains a hotline to receive notifications of possible violations of law, regulations, and the Challenge Corporate Compliance Plan.
- ✓ I understand that my failure to report any concerns regarding possible violations of law, regulations, or the Challenge Corporate Compliance Plan may result in corrective action, including termination of the contract with Challenge.

By: \_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

  <b>Corporate Compliance</b>	<b>Section III</b>	<b>3.4.1c</b>	<b>Page   8</b>
	<i>Quality Assurance &amp; Compliance</i>	<i>Code of Conduct</i>	

**Board of Directors Code of Conduct  
Acknowledgment Form**

- ✓ I acknowledge reading and understanding the Challenge Corporate Compliance Program and the Challenge Code of Conduct.
- ✓ I understand and agree that I must comply with the Challenge Corporate Compliance Program, the Code of Conduct, all laws, regulations, policies, procedures, and other guidance applicable to the responsibilities of my membership on the Challenge Board of Directors.
- ✓ I understand that as a member of the Board of Directors, I have a responsibility to oversee and support the implementation of the Challenge Corporate Compliance Plan, including participating in monitoring, auditing, investigating, and other activities related to compliance.
- ✓ I understand that my failure to report any concerns regarding possible violations of law, regulations, or the Corporate Compliance Program may result in corrective action.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date