

This form should be used by the Human Resources Department to confirm that employees understand the Code of Ethics of LIFE Inc. This form should be completed and returned to Human Resources.

NAME:	EMPLOYEE NUMBER:	
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CODE OF ETHICS AND BUSINESS CONDUCT

STATEMENT OF OUR CORE VALUES

Company Vision: We are committed to being an innovative and creative leader in supported resources:

- To continue educating ourselves, our community and those we support
- To ensure satisfaction of supported individuals by listening and participating in open, honest communication
- To promote equality as well as quality of life through freedom of choice and self advocacy
- To encourage growth and accept change, not only in the individuals we support but also within ourselves and our ideas

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Value Statement: Commitment and follow through are essential practices in our organization. Our belief in what we do is demonstrated by our dedication and loyalty to agency goals and objectives.

In order to pro-actively provide quality supports and therefore maintain a positive, professional reputation in the community, an organization must be comprised of committed professionals who understand the importance of adhering to ethical standards and display respect for all other members of the organization.

As a progressive, committed agency, we ambitiously pursue quality individualize supports focusing on a person-centered approach. Our commitment to supporting individuals holistically, educating the community and teaching self advocacy enhances our positive reputation in the community.

LIFE Inc. will provide an organizational value of mutual respect for all by exercising equality, professional commitment, fairness and acceptance of individuals for who they are.

Mission: LIFE Inc. works to provide individualized supportive environments thereby empowering individuals with developmental disabilities to achieve their personal goals. Our approach focuses on education and learning through self advocacy and informed choices while celebrating peoples’ unique abilities and preserving equality and human dignity.

Build Trust & Credibility: The success of our agency is dependent on the trust and confidence we earn from our employees, supported individuals and families and our community supporters. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: Will this build trust and credibility for LIFE Inc.? Will it help create a working environment in which the agency can succeed over the long term? Is the commitment we are making on that we can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Respect for the Individual: We all deserve to work in an environment where we are treated with dignity and respect. LIFE Inc. is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste.

The agency is an equal employment and affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to their manager or to Human Resources.



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Create a Culture of Open and Honest Communication: At LIFE Inc. everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

LIFE Inc. will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the agency will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Whistleblower: A whistleblower as defined by this policy is an employee of LIFE Inc. who reports an activity that they considers to be illegal or dishonest to one or more of the parties specified in this policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered, misuse of agency and/or client funds; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact their immediate supervisor or the Human Resources Department. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas: confidentiality and protection against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

The agency will not retaliate against a whistleblower for reporting potential violations. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes they are being retaliated against must contact the Human Resources Department immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the Administrator of Human Resources who is responsible for investigating and coordinating corrective action. Employee with any questions regarding this policy should contact the Human Resources Director.

Employees are encouraged, in the first instance, to address such issues with their manager or the Human Resources Department as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with their manager or Human Resources, LIFE Inc.'s Executive Administration does operate with an open-door policy.

Set Tone at the Top: Management has the added responsibility for demonstrating, through their actions, the importance of this code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At LIFE Inc., we want the ethics dialogue to become a natural part of daily work.

Uphold the Law: The agency's commitment to integrity begins with complying with laws, rules and regulations of the State of Rhode Island and Federal Government. Further, each of us must have an understanding of agency policies, laws, rules and regulations that

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apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or agency policy, we should seek the advice from administration. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Health and Safety: LIFE Inc. is dedicated to maintaining a healthy environment. A safety committee has been established to review and provide recommendations on safety in the workplace. They represent all segments of our agency and by doing their important work, attempt to be helpful in avoiding injuries, accidents and other potentially serious situations which would otherwise place valuable employees in harm's way.

Conflicts of Interest: We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the actions we take on behalf of the agency may conflict with our own personal or family interests because of the course of actions that is best for us personally may not also be the best course of action for LIFE Inc. We owe a duty to LIFE Inc. to advance its legitimate interests when the opportunity to do so arises. We must never use agency property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position.

Here are some other ways in which conflicts of interest could arise:

- Owning or having a substantial interest in a supplier or contractor used by the agency and expecting special treatment
- Having a personal interest, financial interest or potential gain in any LIFE Inc. transaction
- Placing agency business with a firm owned or controlled by a LIFE Inc. employee or their family, without utilizing the competitive bidding process

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their manager or the Human Resources Department.

Accepting Business Courtesies: Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when LIFE Inc. is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain agency business.

Meals, Refreshments and Entertainment: We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with their manager or coworker or having the courtesies known by the public

Gifts: Employees may accept unsolicited gifts, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items)

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom LIFE Inc. does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100.00 may not be accepted unless approval is obtained from management. Employees with questions about accepting business courtesies should talk to their managers or the Human Resources Department.

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Offering Business Courtesies: Other than to our government customers, for whom special rules apply, we may provide non-monetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish
- The business courtesy is properly reflected on the books and records of the agency.

Accurate Public Disclosures: We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely, and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation of such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Administration and the Human Resources Department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Record Keeping: We create, retain and dispose of our company records as part of our normal course of business in compliance with all LIFE Inc. policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with LIFE Inc.'s and other applicable accounting principles. We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of agency books, records, processes or internal controls.

Promote Substance Over Form: At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope if we avoid confronting a problem, it will simply go away.

At LIFE Inc. we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that the agency is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although LIFE, Inc.'s guiding principles can not address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability: Each of us is responsible for knowing and adhering to the values and standards set forth in this code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the code, we must contact the Human Resources Department.

The agency takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Confidential and Proprietary Information: Integral to LIFE Inc.'s business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names, addresses, or non-public information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Agency Resources: Agency resources, including time, material, equipment and information, are provided for business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

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Employees and those who represent LIFE Inc. are trusted to behave responsibly and use good judgment to conserve agency resources. Managers are responsible for the resources assigned to their department and are empowered to resolve issues concerning their proper use.

Generally, we will not use agency equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity. We will not solicit contributions nor distribute non-work related materials during work hours without first obtaining administrative approval.

In order to protect the interests of the agency network and our fellow employees, LIFE Inc. reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the internet or agency's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit, or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate. Questions about the proper use of company resources should be directed to Human Resources.

Media Inquiries: LIFE Inc. is a private, nonprofit agency in the community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the agency, we should direct all media inquiries to administration. No one may issue a press release without first consulting with the Community Development Department.

Do the Right Thing: Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with agency guiding principles, Code of Conduct and agency policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my employer and myself?
- What would I tell my child to do?
- Is this the right thing to do?

Information and Resources

Executive Administrators: Larry Wiedenhofer, Liz Wiedenhofer, and Mary Ann Wiedenhofer

Human Resources Director: Matthew Murphy

DO YOU UNDERSTAND THE ABOVE INFORMATION:	<input type="checkbox"/> YES
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NAME:	SIGNATURE:	DATE:
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