

## Code of Ethics

### Introduction

Optimae strives to provide services and programs as part of our efforts to improve the quality of life of our customers and our communities. Through employee ownership and fiscal responsibility Optimae seeks to be a recognized leader in healthcare and human services, providing meaningful support and successful outcomes.

We work in an industry where the pace is fast and change is constant. But there are some things that don't change, like the commitment to providing services honestly, ethically, and with respect for each other and the people we serve. At your side and on your side is not just a slogan. It is part of our DNA.

This Code of Ethics is a summary of our core principles. Specific policies and procedures designed to provide detail on how employees can meet these principles have been and will be adopted from time to time and communicated to employees.

### Mission, Vision and Values

Our mission is to offer comprehensive customer driven services which encourage choice, empowerment, and community integration. Optimae is successful because we put our core values of *choice, respect, teamwork, and education* into practice on the job every day – doing the right thing is part of our culture and keeps the focus on our customers. Our continued success depends on each staff member making decisions that are consistent with our core values. We treat all customers with respect and dignity and provide services that are both necessary and appropriate. We make no distinction in the provision of services based on race, color, religion, disability, age, gender, sexual orientation, or national origin. Services are based on identified customer needs, not on customer or organization economics.

### Public

A copy of the Code of Ethics will be maintained in all regional offices for public review. Reference to the Code and how to access it will be included in the Optimae Annual Report and will be posted on the agency web site.

### Business Practices

- We agree to engage in and promote honest and ethical conduct.
- We will avoid actual conflicts of interest and the appearance of conflicts of interest.
- We will comply with applicable laws, rules, and regulations of federal, state, and local governments.
- We will responsibly use and control all assets, resources and information in our possession.
- We will never make difficult decisions alone. We will ask questions, receive counsel, reflect and take the long-term perspective.
- We will respect the confidentiality of information acquired during the course of our work, and we will not use it for any personal advantage.

- We will encourage the prompt reporting of any violations of this Code of Ethics, the Compliance Plan, and applicable laws.

### **Marketing and Communications Activities**

- We will practice honest, transparent and timely communication to facilitate the free flow of essential information in accord with the public interest.
- We will ensure that all services and products are promoted in a manner that promotes respect for our employees and the people receiving services, as well as sensitivity to cultural values and beliefs.
- We will protect confidential information and comply with all legal requirements for disclosure of information affecting the welfare of others.
- We will protect the privacy of our employees and disclose information about them as permitted or required by law and/or only with their written permission.
- We will protect the privacy of people served and use their stories only with their written permission.
- We will disseminate accurate information and consistent with applicable laws, promptly correct any erroneous communication for which we may be responsible.

### **Professional Responsibilities**

- We are committed to continually improving our relationship with the public, our employees and people we serve.
- We will respect the tools and resources provided to meet the needs of the organization and those that we serve.
- We will not discriminate because of race, color, creed, gender, sexual orientation, age, disability or national origin.
- We will treat one another and customers with dignity and respect.

### **Service Delivery**

- Optima's service delivery system will provide customers with professional services in a non-discriminatory manner and with accepted best practices.
- We will always take reasonable measures to protect the health, safety, and emotional wellbeing of customers and not use professional relationships or authority with them for personal advantage.
- We will keep in confidence information about customers which has been obtained in the course of professional service, unless disclosure is required by law.
- We will strive to provide quality services at all times.

### **Human Resources**

- Through on-going professional development and continuing education, we will strive to remain current with our skills and abilities relevant to the services we offer.
- We are committed to diversity within our workforce to effectively meet the needs of the people we serve.
- We are committed to providing a safe, drug-free and healthy working environment.

### **Conflict of Interest**

- Optima personnel are to avoid any relationship, influence, or activity that might impair, or even appear to impair the ability of staff members to make objective and fair decisions when performing the job.

- Personnel should never ask for a gift or money from a customer and generally should not receive gifts or money from a customer, nor borrow/lend money or items from or to a customer.
- The Employee Handbook contains more information on Conflicts of Interest.

### **Staff Member Conduct**

- It is a violation of Optimae’s policy and of professional ethics for staff persons to engage in interpersonal relationships with individuals receiving services.
- All staff-individual relationships must be formed for professional purposes only.
- Specifically, “dating” and/or any type of sexual activity is forbidden between staff persons and the individuals served.
- Possessing, dispensing, or using a controlled substance during work hours without medical prescription is strictly prohibited.
- Reporting to work or working under the influence of alcohol or a controlled substance without a medical prescription is strictly prohibited.
- Employees shall not work in a manner that willfully obstructs or hinders the work of another employee, and they shall work in a manner that is conducive to efficiency and safety.
- Insubordination is the refusal of a legitimate, work related order from a supervisor or from management personnel, or the use of obscene or otherwise objectionable language to such personnel in a threatening manner. All employees shall avoid insubordinate behavior.
- Employees shall maintain a high level of professionalism in their work. Among other things, professionalism requires an employee to adhere to the performance and ethical standards of their profession; work in a courteous and efficient manner; undertake continuing efforts to improve relationships with the public, coworkers, and customers and maintain a positive attitude toward their work.
- The Employee Handbook contains more specific information on expectations for employee conduct.

### **Personal Fund Raising**

- Personal fund raising among employees in the workplace for school and not for profit organizations is permitted but sales to customers are not allowed.

### **Witnessing of Documents**

- In general Optimae staff members will not witness the signing of documents (wills, mortgages, contracts, divorce decrees, other property settlement documents) for Optimae customers. However, Optimae staff members who are Notary Publics may witness documents if they choose to do so.

### **Whistleblower Protection**

- In accordance with laws governing both profit and nonprofit corporations including the U.S. Sentencing Guidelines, we have adopted a whistleblower policy and procedure, which encourages employees to report any financial improprieties.

- These procedures include the development of a confidential system to report violations. Employee reports of improprieties will be taken seriously and investigated promptly.
- Employees bringing such reports in good faith will not be subject to retaliation or adverse action based on the disclosure of the complaint.
- More specific information concerning Whistleblower Protections may be found in the Compliance Plan, the Employee Handbook, and Core Policy #110.