



Code of Business Ethics and Conduct



A Message from the President

My fellow RIGHTCARE members,

I am proud to work together each and every day to achieve our mission of preventing and alleviating suffering while maximizing the quality of life for the people we serve. At RIGHTCARE, our values and fundamental principles guide us, and how we approach this work.

RIGHTCARE is committed to providing a safe and healthy work environment, one that positions us to do our best work, as we deliver solutions to people and organizations. Each of us shapes the RIGHTCARE culture through our choices and actions. Making the right choice requires a conscious effort to act with integrity, conduct ourselves ethically, and treat each other, our partners, and those we serve with respect.

The RIGHTCARE code of business, ethics, and conduct (the “Code”) provides a roadmap of the ethics and compliance guidelines all RIGHTCARE employees and volunteers must follow. The Code is a foundational document that reminds us of the lawful and ethical manner in which RIGHTCARE has approached its meaningful work since 2009. I ask all RIGHTCARE members to read the Code, and familiarize themselves with its content.

Should you have any questions, or if at any time, you experience something in the course of your work, that you think raises an ethical issue, please speak with your RIGHTCARE supervisor or manager. If for some reason that is not practical or you do not feel comfortable doing so, the Code identifies multiple resources that RIGHTCARE has in place to assist you. I urge you to speak up if you have a concern... For the sake of our mission and those we serve.

From the bottom of my heart, I thank you for your personal commitment to the highest standards of ethical conduct and sound business practices. Your actions and choices build on our organization’s legacy of service and strengthens our life-changing mission for years to come.

President,
Steve Wagner



Table of Contents

Delivering Our Mission Ethically

Abiding by Our Code of Business Ethics and Conduct	6
Oversight and Enforcement	6

Upholding Our Standards

About Our Code of Business Ethics	8
Acting With Integrity	10
Handling Concerns: Special Roles of Supervisors and Managers	10

Our Behaviors

Ensuring a healthy, Safe and Productive Work Environment	12
Using Our Code	14

Our Practices

Conflicts of Interest	16
Business Gifts and Entertainment.....	18
Fraud Prevention	20
Partner Relationships	20
Information Security	22
Protecting Personal Information.....	24
Intellectual Property and Proprietary Information	26
Media and Public Inquiries.....	28
Social Media Use	28
Anti-Bribery and Anti-Corruption.....	30
When You Have Questions or Concerns Relating to the Code	31



Delivering our Mission Ethically

Abiding by Our Code of Business Ethics and Conduct

Every rightcare participant is expected to:

Read, understand and comply with all portions of this code, in addition to the policies that apply to your role.

Act with integrity and cooperate with any internal investigations and reports of unethical behavior.

Complete all required trainings to maintain your ability to comply with the code.

Speak up if you become aware of possible violations of the code, write care, policies, and laws.

All right care, participants are required to certify that they have received and reviewed the code and will abide by it. Any questions about our code should be directed to the office of general counsel at nat@nickelelaw.com

Oversight and Enforcement

This code is endorsed by and has a full support of RIGHTCARE, and it's Board of Governors. The Board of Governors has delegated to management the responsibility for ensuring compliance with the Code. Violations of the Code may result in disciplinary action, up to, and including termination.



Upholding Our Standards

About Our Code of Business Ethics and Conduct

As a charitable organization, RIGHTCARE places the utmost importance on acting with integrity. In other words, the way we approach our work is just as important as the results we achieve.

Our code of business ethics, conduct, details of responsibilities, behaviors and practices that guide our decisions, enable RIGHTCARE to fulfill its mission in the right way. The code applies to all employees and volunteers.

In addition to this code, we are all expected to act accordance with:



Our mission: RIGHTCARE prevents and alleviates human suffering by mobilizing our partners, volunteers, and families around strategic coordination.



Our Vision: we, through our strong network of partners, volunteers, and donors are there in times of need. We turn compassion into meaningful action.



Our Values: compassionate, collaborative, creative, credible, and committed.



Our Fundamental Principles: humanity, impartiality, neutrality, independence, voluntary service, and unity.

RIGHTCARE

Integrity-help hotline 832.603.1398

WWW.RSM@RIGHTCARE.ORG



Upholding Our Standards

Acting with Integrity

As RIGHTCARE members, we must approach all aspect of our work honestly, fairly, and in good faith.



Follow all applicable, federal, state, and local laws and regulations and RIGHTCARE policies, as well as complete all of the training required to comply with the code.



Take Action when we have questions or concerns about compliance, ethics, or business conduct issues by using any of the resources listed in the speaking up section.



Never retaliate against a RIGHTCARE member for raising a concern or asking a question. RIGHTCARE does not tolerate retaliation.

Handling Concern: Special Role of Supervisors and Managers

RIGHTCARE leaders and managers have special obligations to establish an ethical workplace. Supervisors and managers should lead by example and listen to concerns and diverse opinions in a manner that encourages RIGHTCARE members to raise issues when something doesn't seem right.

In order to build and maintain a team culture of trust and integrity:



Lead by example in your decision making. Follow up on how your team is completing projects and confirm that they are achieving results the right way.



Speak with your team about integrity and ethics. Be clear that you expect RIGHTCARE members to approach their work ethically at all times.



Demonstrate to your team, that you will make time to listen, even if they are sharing difficult feedback, or news.



Our Behaviors

Ensuring a Healthy, Safe, and Productive Work Environment

RIGHTCARE's committed to say a safe work place which values diversity, is free of harassment, discrimination, and intimidation, ensures equal employment opportunity , and encourages everyone to do their best work.



Diversity, Equity, and Inclusion: RIGHTCARE members, our clients, donors, and volunteers represent a wide array of cultures, ethnic backgrounds, ages, gender, identities, abilities, lifestyles, and beliefs. As diverse as we may be, we are united in our mission to alleviate suffering through compassionate, respectful, meaningful action.



Fair Treatment and Progressive Discipline: we are committed to the fair treatment all employees and volunteers, and making certain that discipline is prompt, fair, and uniform. We endorse the philosophy of progressive discipline in which we attempt to provide notice of deficiencies and opportunities to improve whenever practical or reasonable.



Non-Discrimination: we do not discriminate against nor do we tolerate discrimination against, any person based on any characteristic protected by applicable federal, state, or local law. Please see our equal employment, opportunity, and commitment to diversity statement for more information.



Security, Safety, and Health: we are committed to providing a secure, injury free workplace, and to following safety and health rules and practices.



Harassment-Free Workplace: We are committed to a work environment in which everyone is treated with respect and dignity. RIGHTCARE has a zero tolerance for harassment.

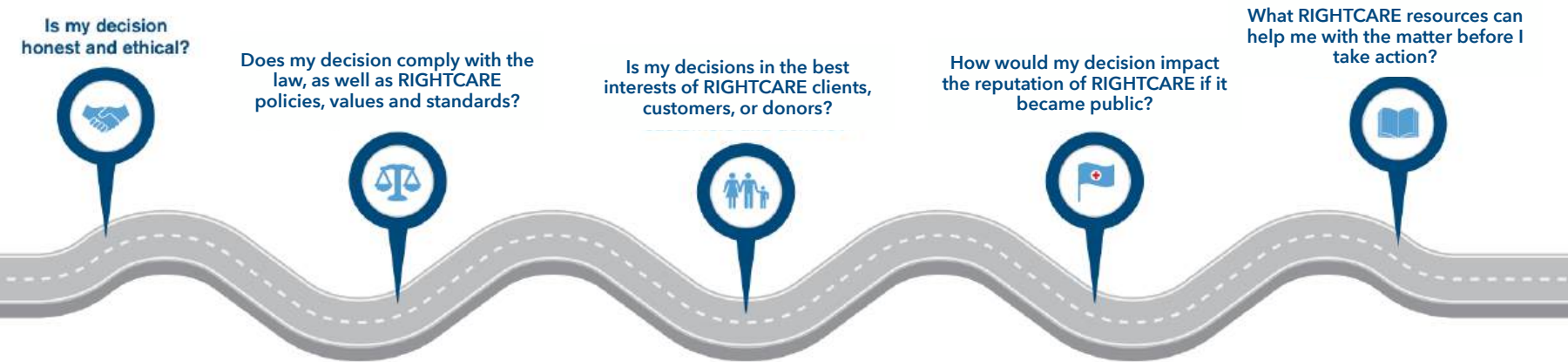


Substance-Free Workplace: We strive to maintain a workplace that is free from the effects of drug and alcohol abuse. We will not tolerate any abuse of drugs or alcohol, that imperils the health or well-being of employees, volunteers, or customers; threatens operations; or compromises the safety of our products and services.



Using Our Code

As a RIGHTCARE member, you may face difficult or unclear situation's related to our work. This decision roadmap can help you analyze your choices so you can make decisions that are ethical and apply with our Code and other RIGHTCARE policies.








Our Practices

Conflicts of Interest

We must take action to address, personal or business interests that are or appear to be in conflict with the interest of rightcare. It's not uncommon for personal and business complex to arise. Many such conflicts (or potential conflicts) can be easily resolved if they are timely disclosed, following the steps outlined in our conflict of interest policy. This allows RIGHTCARE the opportunity to manage the conflict proactively.

RIGHTCARE members must:

-  **Always act in the best intent** of RIGHTCARE.
-  **Avoid** situation where your ability to perform you're right here duties would be impaired due to a personal or business interest.
-  **Disclose** any potential or actual conflict of interest promptly, using the process outlined in our conflict of interest policy. Our OEC will work with you to mitigate the conflict.

Examples of Conflicts of Interest

- Anna's sister owns a printing company. Anna works for the RIGHTCARE and recommends her sister's printing company to a client for an upcoming event, but does not disclose her connection to the company.
- Bill is managing a request for partnership process with RIGHTCARE for a local community. The CEO of one of the requesting partners is his sister-in-law.
- Clyde works in the RIGHTCARE development department and is training a community provider. Clyde has several long time friends that are a part of the community organization he is tasked with training and certifying.



Our Practices

Business Gifts and Entertainment

As we conduct business on behalf of RIGHTCARE, it is imperative that we maintain the highest standards of business and personal ethics. Our Business Gifts and Entertainment Policy provides guidance on the appropriate acceptance of gifts and entertainment in business dealings.

Key guidelines include:



Gifts in the form of cash or cash equivalents, such as gift cards or certificates, are never appropriate.



Gifts and entertainment may never be provided, or accepted, by RIGHTCARE members in the context of a contract negotiation or RFP process.



Any single gift or entertainment accepted must have a nominal value no greater than \$75 and meet all of the guidelines in our Business Gifts and Entertainment Policy.



Our Practices

Fraud Prevention

Fraud is a deceptive act intended to achieve financial or personal gain. Misusing RIGHTCARE funds is a serious offense as well as a threat to the organization's reputation. RIGHTCARE must report any suspected fraud, waste, abuse, or other misappropriation of RIGHTCARE resources or assets.

Examples of fraud include:

Using a RIGHTCARE-issued mission card, travel card, purchase card or procurement card for personal expenses unrelated to RIGHTCARE business.

Misusing funds accessible through electronic means or misappropriating assets such as computers, phones, or other RIGHTCARE's resources.

Making an entry or influencing someone to make an entry on records or financial statements that is intentionally inaccurate or non-compliant with regulatory, legal or organizational standards as detailed in the Financial Manual of Policies and Procedures.

Partner Relationships

RIGHTCARE relies on many partners to achieve its mission and to work with diverse partners with sound practices. We insist on honesty, integrity and fairness in all aspects of our business with partners. The RIGHTCARE Contracting Policy, Business Gifts and Entertainment Policy and related procedures outline the guiding principles for all partner contracts. RIGHTCARE members who have concerns about our contracting process or supplier adherence to our standards should contact the CCL.



Our Practices

Information Security

RIGHTCARE relies on its employees, volunteers and contractors to remain vigilant and help to prevent cybersecurity attacks from threatening the organization. Given the impact a cybersecurity incident would have on our lifesaving work, every RIGHTCARE member needs to take action to manage and mitigate information security risks.

Key requirements include:

- Complying with the Information Security Policy, Standards, Procedures, and Guidelines, whether you are working on a personal device or RIGHTCARE-issued device.
- Reporting security incidents so that IT can move quickly to address the situation and protect RIGHTCARE.



Our Practices

Protecting Personal Information

RIGHTCARE is committed to privacy and the responsible handling of the personal data we receive from our partners, donors, employees, volunteers and other constituents.

Confidential information that RIGHTCARE collects, handles, or uses must be managed and protected in accordance with our Protecting Personal Information Policy and the Confidential Information and Intellectual Property Agreement.

Key requirements include:



We are transparent with our stakeholders regarding our collection and use of their personally identifiable information. We collect and use such information only as needed to accomplish the RIGHTCARE mission and our humanitarian activities.



We handle personally identifiable information responsibly and protect it from improper use and disclosure. Whenever possible, privacy protections are incorporated into RIGHTCARE systems and programs and enforced throughout the organization.



Report improper use or disclosure of confidential personal information immediately to the Chief Technology Officer at jwilliams@penstockconsulting.com so they can take action.



SCOTTSDALE FIRE
PARAMEDIC UNIT

ENGINE

Scottsdale Fire

Our Practices

Intellectual Property and Proprietary Information

RIGHTCARE is a trusted and recognized brand, and the RIGHTCARE name and emblem are valuable RIGHTCARE assets. RIGHTCARE takes steps to protect our name and emblem, as well as the other intellectual property and proprietary information that is vitally important to our work, including copyrights, patents, and inventions.

In order to protect the information and ideas associated with the work of RIGHTCARE, all RIGHTCARE members sign the Confidential Information and Intellectual Property Agreement confirming that the intellectual property they receive, conceive, or develop in their roles is owned by RIGHTCARE. The Agreement also requires RIGHTCARE members to maintain the confidentiality of information they may learn in the course of their work, both RIGHTCARE information and the information of those we serve.

Whenever RIGHTCARE members use the RIGHTCARE name and/or emblem, we all must follow our Brand Standards to ensure we use them in a manner consistent with RIGHTCARE standards.



Our Practices

Media and Public Inquiries

RIGHTCARE is committed to sharing our story with local, national, and international media to inform and inspire the public to support the organization's mission. All public disclosures, press releases, speeches and other communications must be honest, accurate, timely and factual. To help the organization meet its commitment to providing accurate information to the public, RIGHTCARE members should follow these guidelines:

Forward all requests for information from the media and other external organizations to the Communications team at rsm@rightcare.org.

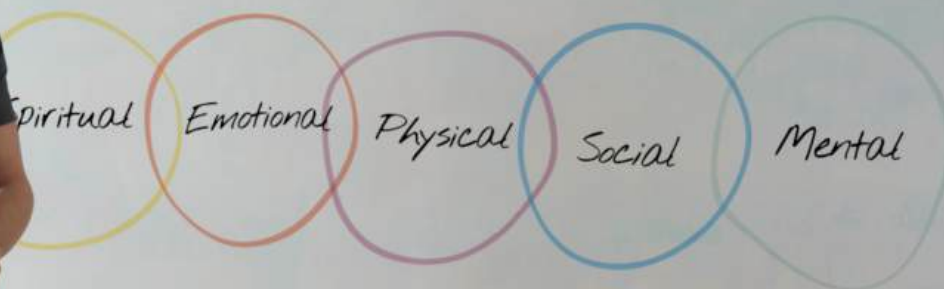
Do not make statements on behalf of RIGHTCARE unless you have prior approval from the communications team.

Direct anyone who is reporting fraud or a concern regarding a RIGHTCARE program, employee or volunteer to RIGHTCARE general council.

Social Media Use

Social media is an integral communications tool, and our staff and volunteers are our best advocates. While we encourage RIGHTCARE members to share RIGHTCARE content on their personal platforms, remember that when you state your RIGHTCARE affiliation you are representing the organization online. All social media postings and re-shares must comply with our Social Media Guidelines. You must never tag official RIGHTCARE social media handles in posts that could be perceived as contrary to our fundamental principles.

Dimensions of wellbeing



Spiritual

Emotional

Physical

Social

Mental

Our Practices

Anti-Bribery and Anti-Corruption

A RIGHTCARE member may not offer, solicit, make or receive a payment for any improper purpose such as a bribe, kickback or other inappropriate benefit. If you have a question about anti-bribery or anti-corruption contact the Office of General Counsel.

When You Have Questions or Concerns Relating to the Code

Every RIGHTCARE member is responsible for speaking up when they need guidance or become aware of a violation of the Code. The following resources can help with your questions or concerns. When warranted, RIGHTCARE will investigate concerns and take appropriate action. The organization endeavors to protect the anonymity of individuals making good faith reports, but may be required to disclose this information to others under certain circumstances.



Your **supervisor, another manager, HR or Volunteer Services** should be your first stop for assistance and advice.



The **Office of General Counsel (OGC)** team that addresses ethics and compliance issues can be reached at nat@nickelelaw.com.



The **RIGHTCARE Concern Connection Line (CCL)** is a hotline at **832.603.1398** that anyone can use to report a concern regarding suspected fraud, waste, abuse, misappropriation, illegal or unethical conduct, violations of safety standards or violations of our Code or any RIGHTCARE policy. Reports can be made online as well as via phone.

RIGHTCARE

Integrity-help hotline 832.603.1398

WWW.RSM@RIGHTCARE.ORG



Mission

Our mission is to empower community partners to deliver outcomes families cannot get anywhere else.