



CODE OF ETHICS-CONDUCT POLICY

The SWSCHP Code of Ethics-Conduct (“The Code”) applies to all members of the Board of Governors, employees, and independent contractors of SWSCHP (“Affected Individuals”). SWSCHP is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to disciplining employees who violate The Code, including those who neglect to report a violation. All Affected Individuals must comply with The Code, immediately report any alleged violations of wrongdoing, and assist leadership in investigating allegations of wrongdoing. While these standards addressed in The Code are intended to guide Affected Individuals in the course of their day-to-day responsibilities for SWSCHP, they do not replace any specific policies and procedures. There may be instances that are not addressed by The Code or existing policies and procedures, or activities that may conflict with these standards. The Code has been developed to provide guidance to SWSCHP’s Affected Individuals regarding SWSCHP’s commitment to high ethical standards.

Commitment to Ethics and Integrity

Operating with a good-faith attitude in all aspects of your job is key to maintaining honesty. Adopting this attitude means that you will not make false or misleading statements, or attempt to misrepresent, falsify, or alter information while conducting your duties. A good faith attitude also requires you to admit mistakes and correct them. When you discover that you have made a mistake, report it to the person that supervises your work and take steps to rectify it.

Honest Communication

SWSCHP requires candor and honesty from all Affected Individuals in the performance of their responsibilities and in all communication pertaining to SWSCHP. It would be in violation of The Code to knowingly make false or misleading statements of any kind about SWSCHP, its services, or about competing entities and their services to any person or entity doing business.

Legal Compliance

SWSCHP shall continually strive to ensure that all activities by or on behalf of SWSCHP are in compliance with applicable laws and regulations. Affected Individuals are expected to comply with all laws, regulations, and SWSCHP policies as well as standards established by associated regulatory bodies. Affected Individuals are expected to know and follow the laws, regulations, policies, and procedures that apply to their job. Any Affected Individual who fails to abide by these standards may be subject to disciplinary action.

Conflict of Interest

In the course of conducting SWSCHP business, Affected Individuals are expected to put SWSCHP's interests ahead of any outside business, commercial or personal interest. Affected Individuals should avoid situations in which a conflict of interest, or the appearance of a conflict, could arise. A conflict of interest may also exist if the demands of your outside activities influence or appear to influence your ability to make objective decisions in the course of your responsibilities to SWSCHP.

Certain Affected Individuals (i.e., board members) are required to complete a conflict of interest questionnaire upon engagement and annually thereafter. Because it is impossible to describe every potential conflict of interest scenario, we rely on your commitment to exercise sound judgment to seek advice when appropriate and to adhere to the highest ethical standards in the conduct of your professional and personal interactions. Anyone who believes he or she has a conflict of interest or the appearance of a conflict of interest shall immediately report it to the President or Executive Director. For additional guidance as to SWSCHP's policy on these types of issues, the Conflict of Interest policy should be consulted.

Gifts and Entertainment/Business Courtesies

Gifts and entertainment represent an area of potential conflict in situations where a competitive, regulatory, supervisory or adversarial relationship could exist. Giving or accepting gifts and entertainment can sometimes be construed as an attempt to unduly influence a relationship.

It is our policy that all gifts from vendors are strictly prohibited. Solicitation of personal gifts or entertainment is never permissible.

Personal Use of SWSCHP Resources

SWSCHP's assets, which include time, materials, supplies, equipment and information, are to be used and maintained primarily for business-related purposes. Affected Individuals may not use SWSCHP resources in a manner that could be harmful or embarrassing to SWSCHP. Any use of SWSCHP resources for personal financial gain unrelated to SWSCHP is prohibited.

Electronic Media

All electronic mail, Intranet access or voice mails are to be used primarily for business purposes. Limited responsible personal use of communications systems is permitted; however, SWSCHP reserves the right to monitor the use of its electronic media resources and to take appropriate disciplinary measures in cases of misuse. Confidential information should never be sent through the Internet or Intranet or stored on mobile or portable devices, unless it is encrypted and otherwise in compliance with SWSCHP and Partner Organizations' privacy and security policies and practices.

Protected Health Information, employee information, and confidential business-related information and data cannot be posted to any social media site (e.g., Facebook, Twitter, etc.) unless authorized by the President of the Board or Executive Director.

Confidentiality

SWSCHP is committed to protecting the privacy of protected health information. SWSCHP is required by both state and federal law to protect the confidentiality of health information that may reveal the identity of a person served. Affected Individuals should do their best to safeguard confidential information about individuals receiving services and SWSCHP itself. In order to mitigate the risk of breach of confidentiality you should:

- Follow SWSCHP and Partner Organization policies on information privacy and security
- Safeguard confidential information through physical and technical means
- Access the minimum amount of confidential information necessary to perform your responsibility

Accurate and Truthful Documentation and Financial Reporting

Affected Individuals are responsible for any form of documentation that you record in any file or database and you are expected to perform your duties accurately, truthfully, and promptly. In order to accomplish this you should:

- Take responsibility and be accountable for everything you document
- Create and maintain accurate records
- Report immediately any suspected improprieties, or suspected incidents of fraud, waste, and abuse to the President of the Board or Executive Director

SWSCHP establishes and maintains a high standard of accuracy and completeness in the documentation and reporting of all financial matters. These records serve as a basis for managing services and are important in meeting obligations to the people it serves.

Equal Employment Opportunity and Diversity

SWSCHP verifies the qualifications of all individuals applying for employment and hires only qualified individuals with appropriate expertise and experience.

We are committed to providing an equal opportunity work environment. We will comply with all laws, regulations and policies related to non-discrimination and fair employment practices in all our personnel actions. We make reasonable accommodations to the known physical and mental limitations of otherwise qualified Affected Individuals with disabilities. Retaliation against individuals for raising claims of discrimination or harassment is prohibited.

Harassment/Violence

All Affected Individuals have the right to work in an environment free of harassment. We will not tolerate harassment by anyone based on the characteristics or cultural backgrounds of those who work at or for SWSCHP. Degrading or humiliating jokes, slurs, intimidation or other harassing conduct are not acceptable. Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions, as well as other verbal or physical conduct that creates a hostile work environment. We do not tolerate workplace violence, which includes threatening, aggressive or abusive behavior.

Marketing and Advertising

We will present only fair, truthful and non-deceptive information in any marketing material for SWSCHP. All material will be reviewed prior to distribution to ensure that the information provided is accurate. All marketing and advertisement involving Partner Organizations will comply with all agreements between SWSCHP and Partner Organizations and SWSCHP policies and procedures.

Relationships with Suppliers, Vendors and Subcontractors

We manage our relationships with suppliers, vendors and subcontractors in a fair and reasonable manner, consistent with all applicable laws, good business practices and in accordance with SWSCHP policies and procedures. Selection of suppliers, vendors and subcontractors will be made on the basis of objective criteria including quality, service, price, delivery, technical excellence, adherence to schedules, and supply of goods and services. Purchasing decisions will be made based on vendors' ability to meet SWSCHP's needs and not on personal relationships, friendship, favors, gratuities or contributions. Suppliers, vendors and subcontractors will be expected to abide by The Code.

Obligation to Report

All Affected Individuals have a responsibility and are required to report any activity by any Affected Individuals' colleague, contractor or Partner Organization that appears to violate applicable laws, rules, regulations, or The Code, through the appropriate chain of command or directly to the President of the Board or Executive, as discussed below. Failure to make an appropriate report may result in disciplinary action. Reporting enables the potential problem to be investigated promptly and addressed in a timely and appropriate manner.

What to Report

SWSCHP Affected Individuals should report to SWSCHP concerns about any legal or ethical issue or practices that pose a risk to SWSCHP. Reasonable belief that a violation is possible is sufficient to initiate a report. To help you determine whether an issue should be reported, consider the following questions:

- Does the concern relate to or arise in a SWSCHP project, protocol, or activity? Is SWSCHP responsible for overseeing the activity giving rise to a concern?
- Does the matter comply with pertinent SWSCHP policies and procedures?
- Is the action legal? Is it ethical?
- Could the activity/behavior result in harm or risk to SWSCHP?

How to Report

Reports of suspected or actual violations can be made in person or by written communication, including email. Reports by Affected Individuals at Partner Organizations should first be made, if possible, to the Affected Individuals member's supervisor or department manager responsible for the relationship with SWSCHP. Reports may also be made directly to SWSCHP by email or phone.

Reporting Concerns – Non-Retaliation/Non-Intimidation

Retaliation and/or intimidation against any SWSCHP Affected Individual or Partner Organization employee who seek advice, raise a concern or report an ethical or compliance issue in good faith will not be tolerated. Affected Individuals or Partner Organization employees who deliberately make a false accusation with the purpose of harming or retaliating against another Affected Individual or a Partner Organization employee will be subject to disciplinary action.

Record Retention

SWSCHP shall establish a record retention policy and procedure, consistent with federal, state requirements. SWSCHP Affected Individuals shall comply with this policy in their record retention practices.

Internal Investigations

We are committed to investigating all reported concerns promptly and confidentially to the extent possible. The President of the Board or Executive Director will initiate an investigation to identify all relevant facts and is responsible for assuring that prompt and appropriate corrective action(s) is taken, in consultation with the Finance Committee. We expect all Affected Individuals to cooperate with investigation efforts.

Corrective Action

Where an internal investigation substantiates a reported violation, appropriate corrective measures will be taken, including, but not limited to, notifying the appropriate governmental agency, instituting appropriate disciplinary action and implementing systemic changes to prevent a similar violation from recurring in the future. Corrective action plans will be shared with all appropriate Partner Organizations and SWSCHP Affected Individuals.

Consequences of Non-Compliance

Failure to comply with applicable laws and regulations, including: (i) federal and state requirements; (ii) SWSCHP policies and procedures; or (iii) the requirements of The Code; or to report violations or suspected violations, could pose significant risks to SWSCHP, as well as to the individuals we serve. Examples of consequences to SWSCHP and/or Affected Individuals for non-compliance include criminal and/or civil fines and penalties.

Disciplinary Action

Disciplinary action, up to and including termination, will be determined and depend upon the nature, severity, and frequency of the violation. The discipline may be imposed for:

- Violating The Code;
- Engaging in the unauthorized use or disclosure of protected health information;
- Failing to report a violation of The Code or cooperate in an investigation;
- Retaliating against an individual for reporting a violation or possible violation of The Code; and
- Deliberately making a false report of a violation of The Code.

Principles of fairness will apply, including, when appropriate, a review of a disciplinary decision.

Internal Monitoring and Auditing

We are committed to an ongoing assessment process. The audits will be designed to address SWSCHP'S compliance with laws, regulations and policies governing, among other things, fund disbursement and expenditure, compliance with federal and state law in SWSCHP projects and the relationship between SWSCHP and Partner Organizations in other areas that may be deemed high-risk.

Adopted: January 17, 2024