

ABLE2's CODE OF BUSINESS CONDUCT

Able2 has long committed itself to upholding the highest quality standards in service delivery and organizational operations. This commitment and our associated reputation of excellence is one of our organization's strongest assets. It is in recognition of this fact that the Board of Directors acted to adopt a Resolution establishing a Corporate Compliance Program.

This Program includes a Code of Business Conduct, which explicitly details compliance expectations. When taken in conjunction with all other aspects of the Corporate Compliance Program and associated policies and guidelines, the Code of Business Conduct establishes the standards that all service partners, whose actions can be attributed to the work of Able2, are expected to adhere to in all business transactions.

Prompt and appropriate action including, but not limited to, discipline for employees, and a re-evaluation of the business relationship in the case of all other service partners, will occur in those instances where violations of such standards are found.

It should be noted that the Code of Business Conduct, as part of the Corporate Compliance Program, as well as all other compliance policies and guidelines as compiled, and disseminated by the Corporate Compliance Officer, are regularly reviewed by this Officer, and Corporate Compliance Committee, to ensure appropriate modification, reflective of developments in applicable legal and regulatory requirements.

1. Ethical Relationships:

Able2 shall only employ or contract with individuals or entities with proper credentials, experience, and expertise.

Able2 will ensure that all service partners have access to all applicable laws, regulations, policies and guidelines necessary for them to perform on behalf of the organization. Regular training on these, as well as the Corporate Compliance Program will be provided.

All service partners will adhere to all applicable laws, regulations, and standards as set forth by federal, state and local governments. This includes, but is not limited to, adherence to all requirements of the Medicaid and Medicare programs.

No employee or other service partner should subordinate his or her professional standards, judgment or objectivity to any individual. If significant differences of opinion in professional judgment occur, they should be referred to management for resolution.

Able2 assures that service partners making reports of suspected violations of this Code of Business Conduct and/or the standards set forth in this Corporate Compliance Program, and associated policies and guidelines can do so without fear of reprisal, or retaliation and that confidentiality will be protected within the limits of the law.

Neither Able2, nor its service partners pay employees, physicians, or other health care professionals, directly or indirectly, in cash or by any other means, for referrals of patients / consumers. Every payment to a referral source must be supported by proper documentation that the services contracted for were, in fact, provided.

Able2 seeks positive relationships with government programs and third party payers. Positive relationships require ongoing communications about service recipient progress and billing.

All service partners will show proper respect and consideration for each other, regardless of position or relationship. Discriminatory treatment, harassment, abuse or intimidation will not be tolerated.

All service partners, in their actions on behalf of Able2, will respect the property of all those with whom we do business, including service recipients and outside businesses.

Service partners will accomplish their business, on behalf of Able2, without engaging in any business, professional, or personal activity that would create a conflict of interest, or an appearance of a conflict of interest, without appropriate disclosure and advance approval by the Board of Directors, or the Executive Director, or their / his / her designee.

Placing business with any firm in which there is a family relationship may constitute a conflict of interest. Advance disclosure and approval are required in such a situation.

Service partners should not become involved, directly or indirectly, in outside commercial activities that could improperly influence their actions.

Service partners should not accept or provide benefits that could be seen as creating conflict between their personal interests and Able2's legitimate business interests.

Service partners should report any potential conflicts of interest concerning themselves, co-workers, or family members to management.

2. Honesty and Professionalism:

It is the responsibility of all those performing duties on behalf of Able2 to maintain the organization's integrity and reputation. As such, all duties will be fulfilled in a manner that promotes the public's trust in the organization.

Service partners should be honest and forthright in any representations made to service recipients, other service partners, payors, and the community.

Able2 is committed to clarity of our mission and purposes, free from any appearance of impropriety. Able2 itself will not pursue any business opportunity or take any other action that will require it to engage in illegal or unethical behavior, or is reasonably likely to fall outside of the organization's mission, purposes or powers.

Service partners engaging in activities on behalf of Able2 will act in a manner consistent with the organization's mission, purpose and powers and ensure that no activity takes place that in any way jeopardizes the tax exemption, licenses, or governmental authorizations of Able2.

All business communications on behalf of Able2 with outside individuals or entities, including claims for payment or reimbursement of any kind, will be truthful and, where appropriate, substantiated by accurate and complete records.

Service partners are personally responsible and accountable for the proper expenditure of Able2 funds and for the proper use of agency property.

Service partners must obtain authorization prior to committing or spending Able2 funds.

Service partners may not use Able2's, or service recipients' resources for personal or improper purposes, or permit others to do so.

Any improper financial gain to a service partner, through misconduct involving misuse of Able2's or a service recipient's property is prohibited, including the outright theft of property or embezzlement of money.

Surplus, obsolete or junked property shall be disposed of in accordance with Able2's policies and guidelines. Unauthorized disposal of property is a misuse of assets.

3. Integrity in Operational Processes:

Service partners who perform billing and / or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with applicable federal / state laws and regulations, as well as Able2's policies and guidelines.

No error or deficiency should be ignored or covered up. Problems should be brought to the attention of those who can properly assess and resolve noted concerns.

No claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate, or fictitious, may be submitted. No falsification of medical, time or other records that are used for the basis of submitting claims will be tolerated.

Able2 will bill only for services actually rendered and which are fully documented in service recipients' records. If the services must be coded, then only billing codes that accurately describe the services provided will be used.

Able2 will prepare / maintain accurate and complete clinical / billing records, and ensure truthfulness in communications with service partners, as well as with government agencies, private agencies, and others doing business with Able2.

All reports or other information required by federal, state, or local government agencies shall be accurate, legible, complete, and filed on time.

All service partners are expected to maintain privacy standards, ensuring that all applicable laws, regulations, policies and guidelines regarding confidentiality of agency records are rigorously adhered to.

Service partners shall not use for personal gain, or reveal, any confidential information concerning Able2 obtained as a service partner of Able2.

Able2's confidential and proprietary information is valuable, and should be protected from unauthorized use or exploitation. Service partners are expected to respect the intellectual property rights of others with whom the organization does business.

All service partners will ensure that all private information owned by others, but in the custody and possession of Able2, be held in confidence, and not utilized outside of the use contemplated by the owner of the information without the express permission of the owner. This includes prohibition against unauthorized use and /or copying of computer software not contained in the license granted to Able2 and installation of unauthorized software on agency computers. All service partners shall take all reasonable steps to protect computer systems and software from unauthorized access or intrusion.

4. Monitoring, Reporting and Enforcement:

As a condition of employment or appointment, all service partners of Able2 are expected to rigorously comply with this Code of Business Conduct, and all other established standards as contained in the Corporate Compliance Program and associated policies and guidelines, as well as all applicable laws and regulations.

All service partners will promptly report suspected violations of this Code of Business Conduct and / or the standards set forth in this Corporate Compliance Program and associated policies and guidelines to their supervisor, an appropriate department head, or the Corporate Compliance Officer, either directly or indirectly via the Compliance Help Line, or anonymously via the Corporate Compliance Concern Form.

All problems discovered surrounding errors in claims that have been submitted, as well as all reports of suspected compliance violations will be fairly, thoroughly, and promptly investigated by appropriate individuals, and will be promptly resolved.

Compliance with this Code of Business Conduct, and all aspects of this Corporate Compliance Program, and associated policies and guidelines, as well as applicable laws, and regulations, is mandatory for all service partners. However, the direction set forth herein does not constitute a contract of employment or warranty of any benefits, and should not be construed as a guarantee of continued employment. Employment with Able2 is on an "At-Will" basis, as defined by New York law. This means that the employment relationship is a voluntary relationship and may be terminated at any time by either the employee or the organization with or without cause, and with or without notice, for any reason not expressly prohibited by law.