



CODE OF CONDUCT & ETHICS

Doing the Right Thing – Always



Code of Conduct and Ethics – Living Our Values

A Message from the CEO

The Cantex Continuing Care Network and its subsidiaries and affiliates (collectively “Cantex”) is a family of services dedicated to providing the highest level of quality and compassionate care to our residents in their most vulnerable moments. Our Team Members are dedicated, caring individuals who demonstrate integrity in all interactions, whether with colleagues, our communities, or the residents entrusted to our care. Throughout every level of our organization, we make the commitment to provide our services in this manner. Cantex’s Code of Conduct and Ethics is the means we use to accomplish this level of excellence.

We are growing to meet the great needs present in our communities. Now, more than ever, we must commit to living our core values every day. We have permission to hold one another accountable to meet and exceed our standards. Our philosophy elevates the needs of our residents, families, and Team Members, setting us apart from others in our field. It is a cornerstone of how we approach one another in each of our interactions, creating an enhanced resident experience while shaping our personal and professional growth. We are committed to Doing the Right Thing- Always:

- Integrity- Doing the right thing. Always, even when no one is watching.
- Ethics- Guided by principles. Committed to quality care.
- Behavior- Every action matters. Every choice reflects who we are.

Our reputation depends on you. It means every one of us exercising personal integrity each day. Our Code of Conduct and Ethics provides an overview of our policies and expectations for each member of our team. It describes laws and regulations that affect our work and offers guidance when we are faced with challenging situations. The Code does not address every situation we may face; if you have a question or concern or would like to discuss anything contained in this document, my door is open to you.

Our Team Members are our greatest strength. Each of us has a personal responsibility to model the highest ethical standards. This means speaking up when you have a question or spot an issue. Together, we can provide exceptional care to our residents, ensure the safest environment possible, and continue to make Cantex an outstanding provider in our Region.

Robin Underhill
Chief Executive Officer



CREATING A CULTURE OF INTEGRITY

In this Code, resident means any person who receives services from Cantex, whether in one of our nursing facilities, through home health or hospice services, or from an affiliated practitioner. Where a policy governs a service line whose own regulations use the word patient, that policy uses patient.

We at Cantex serve some of the most vulnerable members of our communities. We are committed to serving our residents, their caregivers, and each other with integrity. Every day, we turn our values into action, upholding the highest standards—an expectation for every Cantex Team Member.

Being ethical isn't complicated—it's about consistently doing the right thing, for the right reasons, every time, even when no one else is looking.

LEADER RESPONSIBILITY

We expect our leaders to foster a culture of integrity and transparency. We promote an open-door policy, where it is safe to ask questions and raise concerns without fear of retaliation.

Directors, Managers, and Supervisors must:

- Create an environment that supports the highest ethical standards.
- Lead by example, demonstrating ethical behavior at all times and holding Team Members accountable to the same standards.
- Encourage Team Members to openly discuss the Code of Conduct and Ethics, ask questions, and voice concerns.

- Ensure we do not judge or retaliate against Team Members who report a suspected law, Code of Conduct and Ethics, or policy violation in good faith.
- Take swift and appropriate action when a potential violation of law or policy is identified.
- Factor in adherence to the Code and Cantex policies when evaluating Team Members.
- Reach out to the Chief Compliance and Privacy Officer for guidance or support when addressing questions or concerns.

TEAM MEMBER RESPONSIBILITY

Our Team Members are responsible for upholding Cantex's ethical standards when conducting business, providing care, and serving as representatives of the organization. Whether you are a provider, an employee, contractor, or other member of our workforce, you must:

- Understand the Code of Conduct and Ethics and how it applies to you.
- Be able to locate and use Cantex policies in your decision-making.
- Ask questions and report concerns as soon as you become aware of them.
- Complete annual compliance and privacy training, and other coursework as it is assigned.

SAFETY

The care we deliver is the reason Cantex exists, and the quality of that care is a compliance obligation as much as a clinical one. We staff to what our residents need. We assess a resident to record what we found, not to reach a number. We furnish services because a resident needs them and we bill for services we furnished. We do not let a target, a quota, or a budget decide what a resident receives.

Residents and their families are at the heart of everything we do. They are the reason for our mission and the driving force behind our work. We are committed to treating every resident, and their loved ones with respect and dignity, providing care that is safe and medically necessary. Safety and appropriate use of Cantex resources is everyone's responsibility. As a Team Member, you should report any observed or suspected instances of non-compliance with our policies, state, and federal laws.

PROFESSIONAL BOUNDARIES

We develop professional relationships with our residents, and those relationships shape the resident experience. We must operate within proper boundaries with residents. Failure to do so may result in negative outcomes for our Team Members and residents. We serve all residents equally, with compassion. We use respectful language to our residents and fellow Team Members, and maintain a professional demeanor in all our interactions, whether with residents, their families, co-workers, government officials, and vendors. We do not abuse, neglect, or say inappropriate things to our residents or anyone else.

PROTECTING RESIDENT AND CONFIDENTIAL INFORMATION

The next few pages explain the laws we work under. They are written the way laws are written. Under each one you will find a short summary in plain words. The summary is there to help you, not to replace the law: if the two ever seem to say different things, the law and this Code govern, and you should ask the Compliance Department.

Each member of the Cantex team has a duty to protect and respect resident and other sensitive and proprietary information. We treat the privacy of our residents with care and will not reveal or discuss resident-related information except with healthcare personnel involved in their care, payers, and others authorized by the resident or his/her authorized representative.

We use resident information only as necessary to perform our job. Resident information should only be shared with those people who “need to know,” even among family and friends. Here are some helpful guidelines to keep in mind:

- Promptly remove all PHI and sensitive information from printers and scanners. Also, if you see sensitive information on the shared machines, please turn the pages over or place them in a folder until the Team Member is able to retrieve them.
- Avoid discussing resident-specific information in public areas.
- Store sensitive information according to Cantex policies.
- Destroy sensitive information securely by shredding or placing it in locked, confidential bins.
- Access only the resident information you need to know to perform work for treatment, payment, or to conduct Cantex operations.
- If you are texting on a mobile device, be sure and do so in the Teams app. Simply using your phone’s regular text function won’t encrypt our beneficiary or sensitive information!

The Cantex family of services spans a broad geographic region. We perform our work in a variety of facilities and locations. Thus, much of our information is created, communicated, and stored electronically. To help keep our information safe, you are required to:

- Keep your passwords confidential.
- Log off or lock your computer or workstation when you walk away or are finished working.
- Include “#secure” in the subject line of emails containing PHI or other sensitive information if it is sent to an outside party.
- Encrypt and secure mobile devices which contain confidential information. Examples include but are not limited to laptops, flash drives, external hard drives.
- Immediately report a lost or stolen device, phishing scams and other security concerns.

Confidential Information

Confidential information is not limited to resident information. Our Team Members handle a variety of data.

Team Members should only use confidential information when it is necessary to perform your job and must not share it unless there is a legitimate need to know and the disclosure is not prohibited by law or regulation. Often, we may require our business partners to protect our data as well by having them sign a contract such as a Business Associate Agreement.

Proprietary and confidential information includes, but is not limited to:

- Cantex strategic and operating data
- Cost data or financial information
- Contracts and vendor information
- Passwords
- Identifiable clinical information
- Social Security Numbers

LAWS YOU SHOULD KNOW

The Health Insurance Portability and Accountability Act (HIPAA) ensures residents are able to access and can accurately understand how to protect their health information. It directs how their providers will protect and treat this information.

We are committed to following HIPAA, state privacy laws, and Cantex policies.

Be Aware: Accessing a resident's chart without a medical or professional "need to know" reason is a violation of HIPAA, state law, and Cantex policy. Doing so may result in disciplinary action up to and including suspension or termination.

WHAT THIS MEANS FOR YOU

This law is about privacy. Look at a resident's information only when you need it to do your job. Do not talk about residents where you can be overheard, do not text or post anything about them, and do not look up someone you know. If information gets out by accident, report it the same day. Reporting fast is what limits the harm.

CREATING A RESPECTFUL ENVIRONMENT AT WORK

We value our Team Members. We are all expected to maintain a work environment that allows each of us to feel respected. CANTEX does not tolerate harassment, discrimination, or workplace violence against its Team Members.

We ask our Team Members to practice the highest ethical standards to facilitate positive outcomes and support the best possible relationships with our residents and families. If you see or hear something inappropriate, it is alright to speak up. Management and Compliance will investigate the concerns. If related to a Team Member or provider, we will coordinate with human resources for appropriate follow-up. If an incident results in an adverse event, we will coordinate with the facility to facilitate additional reporting, as necessary.

CONFIDENTIAL INFORMATION

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- Contracts and vendor information
- Passwords

- Identifiable clinical information
 - Social Security Numbers
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SUBSTANCE-FREE WORKPLACE

As Team Members, we are prohibited from possessing, using, distributing, or selling legal or illegal drugs or alcohol on premises, in company vehicles, or while conducting Cantex business. Prescription medications may be used when medically necessary. If you participate in an event as a representative or Team Member of Cantex where alcohol is available, you are responsible for using good judgment and acting in an appropriate manner

SUPPORTING ETHICAL BUSINESS PRACTICES

Cantex complies with all state and federal fraud, waste, and abuse (FWA) laws and regulations. As a Team Member, you must never:

Provide anything of value to anyone who is in a position to influence decision-making (such as vendor contracts) or resident referrals.

We are committed to ensuring we provide medically necessary care to our residents. Team Members code and bill accurately for services that are actually rendered. It is important that Cantex claims accurately reflect the services provided, are supported by medical documentation, and comply with applicable federal and state laws and regulations. If we identify an error, we correct it when it is discovered. Each of us plays a part in providing or supporting necessary, quality care that is coded and billed correctly.

LAWS YOU SHOULD KNOW

The Anti-Kickback Statute (AKS) makes it a crime to offer, pay, solicit, or receive anything of value in exchange for the referral of those items or services which are reimbursable by a federal healthcare program.

WHAT THIS MEANS FOR YOU

This law is about gifts and favors. We do not give anything of value to someone who sends us residents, and we do not take anything of value from someone we send residents to. That covers meals, gift cards, tickets, free help, discounts and doing someone a favor. It does not matter how small it is, and it does not matter that everyone is friendly. If someone offers you something, or asks you for something, do not decide on your own. Ask the Compliance Department first.

LAWS YOU SHOULD KNOW

The Physician Self-Referral Law (Stark Law) prohibits a physician from making a referral for certain designated health services to an entity in which the physician (or an immediate member of his or her family) has an ownership/investment interest or with which he or she has a compensation arrangement, unless an

exception applies. Penalties for physicians who violate the Stark Law include fines as well as exclusion from participation in all federal health care programs.

WHAT THIS MEANS FOR YOU

This law is about doctors sending residents to a business they or their family have a stake in. Every arrangement we have with a doctor has to be in writing, signed, and paid at a normal rate for real work. Never agree that a doctor will be paid more for sending us more residents, and never suggest it. If an arrangement with a doctor does not look like it is in writing, report it.

LAWS YOU SHOULD KNOW

The Texas Commercial Bribery Statute prohibits a fiduciary, such as a physician, from knowingly or intentionally accepting, without the consent of the beneficiary, such as a resident, any benefit to influence the fiduciary's conduct in relation to the beneficiary's affairs.

LAWS YOU SHOULD KNOW

The Texas Patient Solicitation Act prohibits a person from knowingly offering to pay or agreeing to accept, directly or indirectly, overtly, or covertly any remuneration in cash or in kind to or from another for securing or soliciting a resident or patronage for or from a licensed Texas provider. The Texas Patient Solicitation Act recognizes the safe harbors enumerated under the Federal Anti-Kickback Statute.

WHAT THIS MEANS FOR YOU

Texas has its own versions of these laws, and they work the same way. Doing the right thing under the federal rules keeps you right under the Texas rules too. If a state inspector or investigator contacts you, be polite, tell the truth, and tell the Compliance Department and the General Counsel straight away.

RESIDENT FINANCIAL RESPONSIBILITY AND WAIVERS

We strictly prohibit offering to waive, or actually waiving, a resident's or responsible party's copayment, coinsurance, deductible, or any other cost-sharing obligation, except in very limited circumstances permitted by law and Company policies. Cantex Team Members may not:

- Offer, promise, or advertise the waiver of copays, deductibles, or other cost-sharing amounts.
- Waive or reduce such amounts routinely or as a matter of general practice.
- Offer or provide free or discounted services.
- Offer or provide any loans, offsets, credits, or rebates.

In limited circumstances, waivers may be granted on a case-by-case basis where the resident demonstrates genuine financial hardship that is documented and addressed in accordance with Cantex policies and procedures.

RESIDENT FUNDS AND PROPERTY

Money that belongs to a resident is the resident's money. We hold it in trust. We do not use it to pay anything owed to Cantex. We do not borrow from a resident, keep a resident's cash outside the account, accept a gift from a resident, or act as a resident's personal payee.

No resident has to deposit funds with us. Where we act as a representative payee, we do it only when no one else suitable can, and we use the money only for that resident.

If money is missing, an account will not balance, a receipt is missing, or someone not on the form asks for a withdrawal, report it the same day. Do not look into it yourself first, and do not wait until you are sure.

ACCURATE RECORD KEEPING

Each member of the Cantex team has responsibility for accurate record-keeping and document retention. It is our duty not to alter or falsify information on any record or document. We help hold one another accountable for developing and maintaining the most accurate records possible. We complete our charting and notes in a timely manner. In general, the use of good judgment, based on high ethical principles, will guide each Team Member with respect to acceptable conduct. If you encounter a situation in which it is difficult to determine the proper course of action, discuss the matter openly with your supervisor, the Chief Compliance and Privacy Officer, and/or Human Resources staff.

Every individual has a duty to raise concerns and questions in good faith. Remember:

- Don't sign your name unless you know the statement is true.
- Don't sign other people's names to records and documents or share passwords.
- Never include false, fraudulent, deceptive, or misleading information in Cantex records

If you see something, say something.



RESPECTING FREEDOM OF CHOICE

The choice of provider is up to the resident, their guardian, or another responsible party. Cantex supplies a list of available providers serving the area and their choice is documented. If the resident selects a provider that has an ownership or financial relationship with Cantex, it must be disclosed to the resident. All referrals and patterns of referrals follow these rules.

RESIDENT RIGHTS

We are committed to providing high-quality, comprehensive, resident-centered care regardless of diagnoses or acuity level that respects the rights and dignity of every individual. We deliver care without discrimination. We fully inform residents of their treatment options, their rights, and the freedom to choose their providers. We prioritize consent, comfort, and cultural sensitivity in every care setting.

MEDICATION SAFETY AND MANAGEMENT

Medication safety is a collective responsibility that spans all levels of care. Our organization is dedicated to maintaining the highest standards by ensuring that: all prescriptions are accurate, necessary, and clinically appropriate; controlled substances are managed in compliance with legal and security requirements; and medication reconciliation is conducted consistently during transitions of care. We are committed to protecting residents from harm.

CLINICAL AND PROFESSIONAL STANDARDS

Our clinical services must meet all licensing and regulatory standards. Team Members must provide care within their scope of practice and maintain professional competence. Appropriate coordination of care between settings—such as skilled nursing, home health, and hospice—can help to ensure quality outcomes.

CODE OF CONDUCT AND ETHICS EXPECTATIONS

As a condition of employment, all new employees will receive the Code and the required compliance training within the first 90 days of hire and annually thereafter for prompt completion.

Team Members will comply with all the elements in their day-to-day activities. Existing employees and affiliated workforce members will receive the Code annually or upon revisions.

A Team Member's actions are significant indications of their judgment and competence. A Team Member's actions and compliance with the Code of Conduct and Ethics constitutes an important element of annual performance evaluations, consideration of position assignments, and promotion.

Abiding by the principles set forth in the Cantex Code is a condition of employment. Violations are evaluated and should be managed consistently with regard to sanctions, such as disciplinary action up to and including termination.

Team Members have a duty to raise issues in good faith regarding potential violations of the Code of Conduct and Ethics. Individuals involved in an incident or deliberately withholding relevant and material information concerning a potential compliance, ethics, or FWA matter may be subject to disciplinary

RAISING CONCERNS

All Team Members including employees, providers, and contractors should feel comfortable voicing questions and concerns.

In fact, we have an obligation as representatives of the Cantex team to raise issues as they arise.

If you have a concern you believe may be a potential or actual violation of law, our Code, or policies, reach out to us:

- Talk with the Chief Compliance and Privacy Officer.
- Call the Compliance Line 1-877-432-4851. It's available to you 24/7.
- Talk with your supervisor or any member of the management team.
- Via email at compliance@cantexcc.com

ABOUT THE HOTLINE

The Compliance Line is staffed by an independent third party.

Callers may remain anonymous.

Compliance will impartially follow up on questions and concerns raised in good faith.

We will investigate issues and implement corrective and disciplinary action as appropriate.

Cantex does not tolerate any type of retaliation in response to reporting a concern.

We will protect caller confidentiality to the extent possible during an investigation and will work to limit sharing relevant information only to those individuals with a legitimate business need to know.

sanctions under our policies and procedures such as oral warning, written warning, suspension, up to and including termination.

COOPERATING WITH INQUIRIES AND INVESTIGATIONS

Cantex is subject to various federal and state regulations. On occasion, we may encounter officials responsible for regulating aspects of healthcare or business practices. **We cooperate with government inquiries and investigations.** If you receive a subpoena, inquiry, or other document from any government agency regarding our business or residents, whether at home or at work, contact the General Counsel immediately. If you become aware of an imminent or ongoing investigation or audit, you should retain all documents in your control relating to the matter. Team Members shall not destroy or alter facility information or documents in anticipation of, or in response to, a request by any applicable government agency or from a court of competent jurisdiction. Our policy, COMPL-13, gives you direction and guidance if you have questions.

CONFLICTS OF INTEREST

Because we want to promote a culture of transparency, we inform our managers if we are involved in a situation that is, or may appear to be, a conflict of interest. A conflict of interest may be a situation involving a financial, professional, or personal activity that may compromise your ability to act impartially and in the best interest of Cantex. To ensure these situations are identified and managed, you should report them as soon as they arise. Examples of potential conflicts of interest that should be discussed with our supervisors include, but are not limited to:

- If you or a family member work for, or have a financial interest in, a competing organization;

- Benefitting personally from a business opportunity available because of your relationship with Cantex; or
- Serving as a Board Member, consultant, partner, or of an organization competing or doing business with Cantex.

We rely on every Team Member to exercise good judgment, maintain professional objectivity, and protect Cantex's reputation. Be sure to discuss the situation with your supervisor and the Chief Compliance and Privacy Officer. If you are in a position that has the appearance of a conflict, it is best to withdraw or recuse yourself from that decision.

PREVENTING FRAUD

Cantex bears a great responsibility to its residents and the public to conduct its business ethically, for services rendered and accurately billed in a timely fashion. We are committed to maintaining integrity, honesty, and diligence in all our dealings and transactions, no matter big or small. Examples of practices that may be considered fraudulent or abusive appear below. Team Members should report such activities promptly to the Compliance Line.

Fraud and abuse may be committed for personal gain or to benefit another individual, provider, or organization. It can take many forms, such as:

- Billing for services or supplies not provided.
- Submitting claims for medically unnecessary services.
- Falsifying documentation, diagnoses, acuity, or dates of service to justify coverage or increase reimbursement.
- Altering medical records or claim forms to obtain higher reimbursement.
- Unbundling or upcoding services to receive higher payments.
- Misrepresenting provider identity, service location, or supervision status.
- Failing to return identified overpayments in a timely manner.

LAWS YOU SHOULD KNOW

In addition, the Federal False Claims Act (FCA) and Deficit Reduction Act (DRA) are in place to ensure Medicare, Medicaid and TRICARE are protected from fraud and abuse.

WHAT THIS MEANS FOR YOU

This law is about billing. We may only bill for care we actually provided, to the person who received it, on the day we provided it. Do not record care that did not happen. Do not change a record to make a bill work. Do not sign or date anything for a date it did not happen on. If you are asked to do so, say no and report it. If you think a bill went out wrong, say so. Nobody gets in trouble for reporting a mistake, and we have to pay money back when we find one occurred.

LAWS YOU SHOULD KNOW

The Criminal Health Care Fraud Statute prohibits knowingly and willfully executing, or trying to execute, a scheme or artifice: to defraud any health care benefit program. Or to get by means of false or fraudulent pretenses, representations, or promises any of the money or property owned by, or under the custody or control of, any health care benefit program in connection with the delivery of or payment for health care benefits, items, or services. Proof of actual knowledge or specific intent to violate the law is not required. Penalties for violating the Criminal Health Care Fraud Statute may include fines, imprisonment, or both.

WHAT THIS MEANS FOR YOU

This law makes health care fraud a crime. It is not only about the company: a person can be charged. That is why we never guess, never cover something up, and never help someone else do either. If you are worried about something, saying so early is always the right move.

FALSE CLAIMS LAWS AND YOUR PROTECTIONS

Because Cantex receives Medicaid payments, Federal law requires us to tell every Team Member, contractor, and agent about the laws that deal with false claims, and about the protections you have if you report a concern. That is section 6032 of the Deficit Reduction Act of 2005.

The short version: it is unlawful to submit a claim for payment that is false or to keep money that was paid by mistake. Knowingly doing so includes not just lying, but deliberately not looking when you should. The penalties are substantial. They apply to the company and they can apply to an individual person.

Texas has its own version of these laws, and they work the same way.

If you report a concern in good faith, the law protects you and so does Cantex. That protection applies even if you turn out to be mistaken. It applies whether you report to your supervisor, to the Chief Compliance and Privacy Officer, to the Compliance Line, or to a government agency, and nothing in this Code or in anything you have signed prevents you from contacting a government agency.

The full notice, with the statutes, the penalties and the protections set out in detail, is the Deficit Reduction Act Notice. You receive it on hire and with your annual training, it is in the Team Member Handbook, and it is on the compliance page of the Cantex website.

GIFTS AND ENTERTAINMENT

Team Members may not ask for or accept gifts from residents and their family members. If something is offered from a resident, family member, vendor, provider, or other individual/entity in a position to refer, Team Members should politely refuse or return the item.

Cantex does not give or accept gift cards or gift certificates. They are considered Items of Value and defined as “cash in kind.”

Nor do we purchase, give, or receive gifts and/or meals from US or foreign government officials and their agents.

The offer or delivery of loans, rebates, services, or remuneration of any goods, products, services, or items is barred by law. Payment of any kind, connected to resident referrals, is prohibited.

We comply with all federal and state healthcare fraud and abuse laws and regulations, including the Anti-Kickback Statute, Stark Law, and the False Claims Act.

PERMITTED MEALS, GIFTS, AND ENTERTAINMENT

Occasional gifts purchased by Cantex for its Team Members. Please note that gifts over a certain threshold are the Team Member's taxable income. Contact payroll for the current IRS guidance.

Cantex may, on occasion, purchase a nominal item for a resident or resident's family. The retail value of the item may not exceed \$15 or \$75 in total per year. These items may not be cash or cash equivalents.

Occasional business meals or social occasions may qualify as proper business activities. The purpose of the meal should be to discuss Cantex business. Team Members should obtain approval from the Chief Compliance and Privacy Officer and/or General Counsel prior to attending the event.

Perishable items such as food should be shared among Team Members.

Remember: we never provide or accept cash or cash equivalents from third parties, including, but not limited to, traveler's checks, money orders, stock, negotiable instruments, or honorariums.

WHAT THIS MEANS FOR YOU

We never offer, give or receive something of value in exchange for, or in hopes of receiving, referrals. We do not offer, give, or accept bribes or kickbacks. We compensate and determine our business arrangements based on fair market value, not the volume or value of referrals.

HOW THIS CODE WORKS WITH OUR POLICIES

This Code states what we expect of one another. It does not answer every question, and it is not meant to. Behind it sits the Cantex compliance policy set, COMPL 01 through COMPL 45, which says who does what, how often, and on what form. Where this Code and a policy address the same subject, read them together; where a policy is more specific, follow the policy and ask the Compliance Department if the two seem to differ.

This Code applies across Cantex, its subsidiaries and affiliates, any entity in which Cantex holds a direct or indirect equity interest of greater than 50 percent, and any entity whose daily operations it manages or controls. It applies to every Team Member, to Governance, and to contractors and agents who perform work for Cantex.

QUESTIONS ABOUT OUR CODE OF CONDUCT AND ETHICS?

Contact us at any time! Here's how to reach us:

- Call the Compliance Line 1-877-432-4851. It's available to you 24 hours a day, every day and you may remain anonymous.
- Talk with your supervisor or any member of the management team.
- Talk with the Chief Compliance and Privacy Officer.
- Via email at compliance@cantexcc.com or online at www.CantexDoingRight.com at any time, without giving your name.
- The Compliance Program poster, with these reporting channels, is posted in every facility and at the home office.

AUTHORITIES AND REFERENCES

42 U.S.C. § 1320a-7j(c) (compliance and ethics program); 42 U.S.C. § 1320a-7b(b) (Federal anti-kickback statute); 31 U.S.C. § 3729 (False Claims Act); 42 C.F.R. § 483.85 (compliance and ethics program); 45 C.F.R. pts. 160 and 164 (HIPAA).

OIG, General Compliance Program Guidance (Nov. 2023) at 33-37 (written standards and code of conduct).



STAYING COMPLIANT

Q: How do I report observed or suspected fraud or abuse?

A: Each Team Member shall report any suspected or observed fraud and/or abuse to their immediate manager, the Chief Compliance and Privacy Officer, or by calling the Compliance Line. Any employee utilizing these reporting methods will be treated fairly without threat of retaliation or retribution.

[The Compliance Line](#)

Available 24 hours a day, 7 days a week.

Phone: 1-877-432-4851

Each Team Member will be provided specific instruction in the availability and use of the compliance line at time of hire and yearly thereafter.

Q: What happens once fraud or abuse is reported?

A: Any information dealing with a compliance issue of suspected or observed fraud or abuse will be investigated promptly. Once the investigation is completed, corrective action will be taken, where appropriate, including disciplinary action.

Q: What should I do if information containing protected health information (PHI) is lost or misplaced?

A: In the event of any known unauthorized exposure of PHI, immediately report this to the Chief Information Security Officer at service@cantexcc.com. Incidents can also be reported to the Chief Compliance and Privacy Officer and General Counsel, or the Compliance Line.

STAYING COMPLIANT

Q: I work at a skilled nursing facility and received a call from an insurance company requesting detailed information about a resident's recent treatment and diagnosis. The caller said they need it for claim processing. Can I share the information?

A: Under HIPAA, PHI can be shared with a health plan for payment purposes—but you must verify the identity of the insurance representative and ensure the disclosure is limited to the minimum necessary information. Remember, when considering whether to share PHI, ask yourself if it is for a valid purpose like treatment, payment, or operations, or whether the resident has authorized it. If you're unsure, don't hesitate to ask the Chief Compliance and Privacy Officer.

Q: Is it okay to use company property for personal use?

A: No. Cantex property should be used for business purposes only and should not be used for personal benefit. This includes owned, rented, or leased property, equipment, vehicles, supplies, computer systems or software, or any other forms of property. The assets of individuals or companies with which we do business, while in our care or use, should be treated with the same respect as property owned by Cantex.

Q: What should I do if I suspect inappropriate behavior between a staff member and a resident?

A: Any employee who suspects or observes inappropriate behavior must report the matter immediately to their manager. There are certain issues of abuse and neglect that can trigger government reporting requirements, so please talk to your manager and/or business leader if this occurs. If the employee does not wish to report to his or her manager, they may contact the Chief Compliance and Privacy Officer directly or call the Compliance Line.

Q: Texas Health and Human Services sends a request for additional information about how residents are deciding on their service providers, like therapy and pharmacy. You know what the policy and practice is. Should you send the policy with a detailed narrative directly to Texas Health Human Services?

A: No. Reach out to your manager and the Chief Compliance and Privacy Officer informing them of the Texas Health and Human Services request and ask for next steps as to how to respond.

Q: You run into an old colleague at a reunion and learned that he now works for a physician group that is part of our network. The following month, the friend leaves a message asking to discuss a number of claims the physician group had filed that were rejected and are pending appeal. May you respond to his call?

A: Disclose the contact and your prior relationship to your manager and the Chief Compliance and Privacy Officer before responding to the call. We may direct you to stay out of any business decision involving your friend's employer.



We never offer, give or receive something of value in exchange for, or in hopes of receiving, referrals. We do not offer, give, or accept bribes or kickbacks. We compensate and determine our business arrangements based on fair market value, not the volume or value of referrals.

Team Member Acknowledgement for Code of Conduct and Ethics

Certificate of Compliance

1. I have read the entire Code of Conduct and Ethics. I have had the opportunity to ask any questions about its contents, and I understand fully how Cantex's policies relate to my position.
2. I hereby acknowledge my obligation and agreement to fulfill those duties and responsibilities as set forth in the Code of Conduct and Ethics and to be bound by its standards and Cantex policies and procedures, including, but not limited, reporting potential violations.
3. I further certify that, throughout the remainder of my association with the Company, I shall continue to comply with the terms of the Code of Conduct and Ethics and Cantex's policies and procedures.
4. I further certify that when I become aware of potential violations of the Code of Conduct and Ethics, the Company's policies and procedures, or applicable laws or regulations, I will communicate those to my manager, the Chief Compliance and Privacy Officer or the Compliance Line.
5. I understand that violations of the Code of Conduct and Ethics, Cantex's policies and procedures, or applicable laws or regulations may lead to disciplinary action, including discharge.

Signature

Date

Printed Name

Title/Position within the Company

Facility Name

Business Telephone Number (with area code)

A STATEMENT FROM GOVERNANCE

Governance has received and reviewed this Code and endorses it. Governance expects the Compliance Program to be resourced to do what this Code promises, receives the Chief Compliance and Privacy Officer's report at least quarterly, and expects to be told promptly when something has gone wrong rather than after it has been resolved. A compliance concern raised in good faith is welcome at every level of this organization, including this one.

Cantex Governance _____ Date _____

The Chief Compliance and Privacy Officer reviews this Code at least every two years and whenever the law or a Federal health care program requirement described herein changes.