

# EMPLOYEE HANDBOOK

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Virginia Staff



**HomeCentris**  
**HEALTHCARE**  
HOME-CENTRIC HEALTHCARE STRATEGIES

**HomeCentris Healthcare, LLC**  
**And Subsidiaries**

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## FOREWORD

Welcome to HomeCentris Healthcare, Personal Home Care, HomeCentris Home Health and HomeCentris Community Care (collectively referred to as “HomeCentris” in this handbook).

Whether you have just joined our staff or have been with HomeCentris for a while, we are confident you will find our company a dynamic and rewarding place to work, and we look forward to a productive and successful association. We consider the employees of HomeCentris to be one of its most valuable resources. This handbook was written to serve as the guide for the employer/employee relationship.

There are several things to remember about this handbook. First, it contains only general information and guidelines. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. The subjects in this handbook are covered in detail in official policy documents in any HomeCentris office or available on our website at [www.homecentris.com/careers](http://www.homecentris.com/careers). In addition, you may always find the most up to date version of this handbook on the website.

Second, the procedures, practices, policies, and benefits described here may be modified or discontinued from time to time. We will try to inform you of any changes as they occur.

Third, this handbook and the information in it should be treated as confidential. No portion of this handbook should be disclosed to others, except HomeCentris employees and others affiliated with HomeCentris whose knowledge of the information is required in the normal course of business.



# THE HOMECENTRIS WAY

HomeCentris Healthcare’s Vision Statement and Core Values are called “The HomeCentris Way.” They form the basis of HomeCentris’ culture and they exemplify the compassionate care and excellent outcomes we have provided our clients since 2000. As you move forward with HomeCentris, we hope you will embrace the HomeCentris way and exhibit these values in your everyday work life.

## Core Values

HomeCentris’ Core Values describe who we are as a company and are the backbone of The HomeCentris Way. They describe the way we do things at HomeCentris. They are unchanging and help guide our interactions with clients and patients, family members, staff members and all other members of the communities we serve. Below are the Core Values and some key examples as written by our staff.

### Compassion

- We smile and say hello to our clients, patients, family members, and co-workers.
- We think with our hearts.
- We try to emotionally connect with others.
- We take extra time to reassure and explain our procedures to our clients and patients.
- We feel others’ pain as our own.
- We show empathy and patience towards every person we serve.
- We treat others the way we would like to be treated.

### Excellence

- We don’t expect perfection, but we strive for it.
- We require an unwavering commitment to quality.
- We expect ‘doing your best’ to become a way of life.
- We believe excellence is the outcome from the pursuit of perfection.
- We pursue and work tirelessly towards successful outcomes.
- We solve ordinary issues in extraordinary ways.
- We never allow ‘good enough’ to be good enough.

## Integrity

- We comply with all laws and regulations governing our business.
- We do the right thing all the time, even when no one is looking.
- We are honest with the people around us, including clients, family and co-workers.
- We act in ways that allow us to sleep well at night.
- We continuously follow a personal and professional code of ethics.
- We are ethical, honest, and fair in our relationships and business practices.
- We keep our promises and follow through on our commitments.

## Empowerment

- We allow staff to satisfy our clients and patients, without asking permission.
- We allow our staff the freedom to act and expect them to be accountable for their decisions.
- We provide the foundation and training to our staff to further themselves.
- We take initiative and are confident in making decisions.
- We solve problems on the spot.
- We enable our team and our clients to control their destiny.
- We encourage people to speak up and express their opinions.

## Accountability

- We understand our roles and are accountable for our decisions and actions.
- We are responsible for the actions we take and those we fail to take.
- We admit when we make bad decisions and are willing to work on our mistakes.
- We strive for complete transparency at all levels of our organization knowing that transparency drives accountability.

## Core Purpose

HomeCentris' Core Purpose describes why our team members come to work every day. In study after study, people have expressed the desire to remain independent at home rather than moving to a more institutional level of care. At HomeCentris, our mission is to continually

strive to find new resources and solutions to empower our clients to remain in their homes. Officially, our Core Purpose is:

***“Empowering people to remain in the community through innovative health solutions.”***

We believe that by constantly asking what we can do to keep our clients at home, we are fulfilling our Core Purpose.

## EMPLOYMENT AT-WILL

Employment with HomeCentris is at-will, unless state law provides otherwise. This means that employment may be terminated for any or no reason, with or without cause or notice at any time by the employee or by the Company. Nothing in this Handbook or any oral statement shall limit the right to terminate at-will. This at-will employment policy is the sole and entire agreement between the employee and HomeCentris as to the duration of employment and the circumstances under which employment may be terminated. No manager or supervisor has any authority to enter into a contract of employment express or implied that changes or alters the at-will employment relationship. Only the President/Owner of the Company or his or her authorized representative has the authority to enter into an employment agreement that alters the at-will employment relationship and any such agreement must be in writing signed by the CEO or his or her authorized representative.

## COMMITMENT TO DIVERSITY

### Equal Opportunity Employer

HomeCentris is an equal opportunity employer. In accordance with applicable law, the Company prohibits discrimination against any applicant or employee based on any legally-recognized basis, including, but not limited to: race, color, religion, sex, age, national origin or ancestry, marital status, sexual orientation, gender identity, genetic information (including testing and characteristics), citizenship status, mental or physical disability (including pregnancy, childbirth, lactation, or related medical conditions), or any other status protected under applicable federal, state, or local applicable law. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and co-workers.

## Sexual and Other Unlawful Harassment

HomeCentris is committed to providing a work environment free of unlawful harassment. As a result, the Company maintains a strict policy prohibiting sexual harassment and harassment against applicants and employees based on any legally-recognized basis, including, but not limited to: race, color, religion, sex, age, national origin, marital status, sexual orientation, gender identity, genetic information, or disability (including childbirth, lactation, or related medical conditions), or any other status protected under applicable federal, state, or local applicable law. All such harassment is prohibited.

Our anti-harassment policy applies to all persons involved in our operations and prohibits harassing conduct by any employee, including nonsupervisory employees, supervisors, and managers. This policy also protects employees from prohibited harassment by third parties, such as vendors, clients, or temporary or seasonal workers. If such harassment occurs on the job by someone not employed by HomeCentris, the procedures in this policy should be followed.

### ***Sexual Harassment Defined***

Sexual harassment includes unwanted sexual advances, requests for sexual favors, or visual, verbal, physical conduct of a sexual nature when:

- Submission is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment also includes various forms of offensive behavior based on sex. The following is a partial list:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a rejection of sexual advances.
- Leering, sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages.
- Making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an employee's body or dress.
- Verbal sexual advances or propositions.

- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes or invitations.
- Touching, assault, impeding or blocking movements.
- Retaliation for making or threatening to report sexual harassment.

### ***Other Types of Harassment***

Harassment based on any legally-protected classification stated above is prohibited. Prohibited harassment may include behavior like the illustrations above pertaining to sexual harassment. They may also include conduct such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's protected status;
- Visual conduct including derogatory posters, photography, cartoons, drawings or gestures based on protected status; and
- Physical conduct including assault, unwanted touching or blocking normal movement because of a protected status.

### ***Protection Against Retaliation***

Retaliation is prohibited against any person by another employee or by HomeCentris for using this complaint procedure, reporting proscribed discrimination or harassment, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

### ***Complaint Procedure***

Any employee who believes that he or she has been harassed, discriminated against, or subject to retaliation by a co-worker, supervisor, agent, client, vendor or customer of HomeCentris, in violation of the foregoing policies, or who is aware of such harassment, discrimination or retaliation against others, should immediately provide a written or verbal report to his or her supervisor, any other member of management

or to Human Resources. If you are not comfortable approaching these resources, call the Compliance Hotline at 888-739-0965.

After a report is received, management will perform a thorough and objective investigation. The investigation will be completed and a determination made and communicated to the employee as soon as practical. The Company expects that all employees will fully cooperate with any investigation.

If we determine that this policy has been violated, remedial action will be taken. Appropriate action will also be taken to deter any future harassment or discrimination prohibited by this policy. If a harassment complaint, discrimination or retaliation is substantiated, management will take disciplinary action, up to and including termination.

## Accommodation of Individuals with Disabilities

HomeCentris complies with the Americans with Disabilities Act (ADA), as amended, and applicable state and local laws providing for nondiscrimination in employment against qualified individuals with disabilities. HomeCentris is committed to engaging in an interactive process to determine the availability of a reasonable accommodation to any qualified individual who:

- requests an accommodation during the application process;
- requests an accommodation to enable him/ her to perform essential job functions or gain access to company facilities; or
- asks for an accommodation to enjoy equal benefits of employment.

It is HomeCentris' policy to, without limitation:

- Ensure qualified individuals with disabilities are treated in a nondiscriminatory manner in the pre-employment process and employees with disabilities are treated in a nondiscriminatory manner in all terms, conditions, and privileges of employment;
- Keep all medical-related information confidential in accordance with the requirements of the ADA, state, and local law and retain such information in separate confidential files;
- Engage in an interactive process with applicants and employees to determine if a reasonable accommodation exists that would allow him/her to perform the essential functions of the position, and would not create an undue hardship on HomeCentris; and

- Notify individuals with disabilities that we provide reasonable accommodation to qualified individuals with disabilities, by including this policy in HomeCentris' employee handbook.

HomeCentris will process requests for reasonable accommodations in a timely manner. Human Resources has the administrative responsibility for the program. Employees needing an accommodation should contact their immediate supervisor/manager or Human Resources for assistance. If an accommodation is reasonable and will not impose an undue hardship on the Company and/or a direct threat to the health and/or safety of the individual or others, HomeCentris will generally make the accommodation, or it may propose another reasonable accommodation. Employees are required to cooperate by providing all necessary documentation supporting the need for accommodation, and be willing to consider alternative accommodations when applicable.

### Accommodations for Disabilities Due to Pregnancy

In accordance with law, HomeCentris will provide pregnant employees with certain reasonable accommodations beyond the requirements of the Americans with Disabilities Act and the Pregnancy Discrimination Act so long as the requested accommodation does not impose an undue hardship. Pregnant employees are asked to provide notice to the Company of a temporary disability, even if the accommodation removes essential functions of the position. The Company will consider the following accommodations for a pregnant employee:

- more frequent or longer restroom breaks,
- breaks to express breastmilk,
- access to a private location other than a bathroom for the expression of breast milk;
- acquisition or modification of equipment or access to or modification of employee seating,
- a temporary transfer to a less strenuous or hazardous position,
- assistance with manual labor,
- job restructuring,
- a modified work schedule,
- light duty assignments, and,
- leave to recover from childbirth.

If an employee requests a transfer to a less strenuous or hazardous position as a reasonable accommodation, HomeCentris will honor the request if the employee's health care provider advises the transfer and we can transfer the employee without (a) creating an additional position; (b) discharging the employee; (c) transferring any employee with more seniority than the one requesting the accommodation; or (d) promoting an employee not qualified for the job.

The Company will not require the employee to take leave as an accommodation if another reasonable accommodation can be provided to the known limitations related to the pregnancy, childbirth, or related medical conditions of such employee. If leave is an accommodation, to the extent leave under this policy also qualifies as leave under the Family and Medical Leave Act, the two leaves will run concurrently.

Employees needing an accommodation should contact their immediate supervisor/manager or Human Resources for assistance.

### **Lactation Accommodation**

HomeCentris will provide a reasonable, unpaid break time to accommodate an employee desiring to express breast milk for the employee's infant child. Employees needing breaks for lactation purposes may use ordinary paid rest breaks or may take other reasonable break time when needed. If possible, the lactation break time should run concurrently with scheduled meal and rest breaks already provided to the employee. If the lactation break time cannot run concurrently with meal and rest breaks already provided or additional time is needed for the employee, the lactation break time will be unpaid for nonexempt employees.

Non-exempt employees will be relieved of all work-related duties during any unpaid break. Where unpaid breaks or additional time are required, non-exempt employees should work with their supervisor or Human Resources regarding scheduling and reporting the extra break time. Where state law or local imposes more specific requirements regarding the break time or lactation accommodation, the Company will comply with those requirements.

The Company will provide employees with the use of a room or a private area, other than a bathroom or toilet stall, that is shielded from view,

within proximity to the work area, and free from intrusion from coworkers and the public.

## Religious Accommodation

HomeCentris will provide reasonable accommodation for employees' religious beliefs, observances, and practices when a need for such accommodation is identified and reasonable accommodation is possible. A reasonable accommodation eliminates conflicts between religious beliefs, observances, or practices and the employee's job requirements, without causing undue hardship to HomeCentris. The Company requests that accommodation requests be made in writing, and in the case of schedule adjustments, as far in advance as possible.

## GENERAL EMPLOYMENT PRACTICES

### Employee Classifications

Employees are classified as either exempt or nonexempt under federal and state wage and hour laws and are further classified for administrative purposes. The following designations are used throughout this Employee Handbook

- Full-time Employees: Those hired as employees to work a minimum of thirty (30) hours per week on a regular basis. Full-time regular employees are eligible for all HomeCentris sponsored benefits.
- Part-time Employees: Those hired as employees to work fewer than thirty (30) hours per week on a regular basis. Part time employees are not eligible for any HomeCentris sponsored benefits.
- Per diem or PRN employees: Those hired as employees and working on an as-needed basis, either by their own requirement or by HomeCentris' requirement. Per Diem and PRN employees are not eligible for any Company sponsored benefits.
- Temporary employees: Those hired as employees to work full time or part time with the understanding their employment will be terminated upon completion of a specific assignment.
- Leased workers and/or agency employees: Those assigned to work at HomeCentris through a leasing agency. These workers are like temporary employees assigned to work at HomeCentris through temporary employment agencies, however, leased workers are

normally engaged for extended periods of time. Leased workers are employees of the leasing agency and not of HomeCentris.

- **Non-exempt:** Non-exempt employees are employees whose job positions do not meet federal Fair Labor Standards Act (FLSA) or applicable state exemption tests, and who are not exempt from minimum wage and overtime pay requirements. Nonexempt employees are eligible to receive overtime pay for hours worked in excess of 40 hours in a given week, or as otherwise required by applicable state or local law. Employees will be informed whether their status is exempt or non-exempt and should consult Human Resources with any questions or concerns regarding this status.
- **Exempt Employees:** Exempt employees are employees whose job assignments meet specific tests established by the FLSA and state law and who are exempt from minimum wage and overtime pay requirements. Exempt employees are compensated on a salary basis. Employees will be informed whether their status is exempt or non-exempt and should consult Human Resources with any questions or concerns regarding this status.

## Personnel Files

Employees may inspect their own personnel file in the presence of a representative of HomeCentris. Please contact Human Resources to schedule a time. Employees may not be allowed to view investigation records or any letters of reference that have been prepared or collected by management. Employees will be provided access to personnel records in accordance with applicable state law.

Upon written request from you or your attorney, HomeCentris will furnish your dates of employment with the Company, your wages or salary during the employment, your job description(s) and job title(s), and any injuries sustained during the course of employment. The request must be in writing and addressed to the HR Department. HomeCentris reserves the right to charge you or requestor a reasonable fee per page for your request.

Only authorized members of management and Human Resources have access to an employee's personnel file. However, the Company will cooperate with, and provide access to an employee's personnel file to,

law enforcement officials or local, state, or federal agencies in accordance with law, or in response to a subpoena.

## Personal Data Changes

To better assist employees and/or their families in the event of personal emergencies, HomeCentris needs to maintain up-to-date contact information. Maintaining accurate information in our files also is important for recordkeeping, payroll and benefits related purposes.

Changes in name, address, telephone number, marital status, number of dependents or changes in next of kin and/or beneficiaries should be given to Human Resources promptly or submitted via the website.

## Employee Eligibility and Work Authorization

The Company is committed to employing only individuals who are authorized to work in the United States and who comply with applicable immigration and employment laws. As a condition of employment, every individual must provide satisfactory evidence of his or her identity and legal authority to work in the United States within 72 hours of commencing employment. If the employee cannot verify his or her right to work in the United States within 72 hours of employment, the Company will be required to terminate his/her employment immediately.

## Employment of Minors

It is our policy not to hire individuals under the age of sixteen (16) years and to discourage hiring sixteen (16) and seventeen (17) year old minors.

Under Virginia law, minors may not be employed for more than five (5) hours continuously without a 30-minute lunch break. Minors may not work during any time when the minor's school attendance is required.

## Romantic and Family Relationships at Work

We will not take adverse employment action against any employee for engaging in romantic relationships during nonworking hours away from Company premises. However, we will consider such relationships when they affect an employee's job performance, occur during working time, or on Company premises, or pose a danger of a conflict of interest.

A familial or intimate relationship among employees can create an actual or perceived conflict of interest especially where one relative, spouse, partner, or member of such a relationship supervises another relative, spouse, partner, or member. To avoid this problem, we may refuse to hire or place a relative or other intimately associated individual in a position where the potential for favoritism or a conflict exists.

If two employees marry, become related, or enter an intimate relationship, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. In other cases where a conflict or potential a conflict arises, even with no supervisory relationship involved, the parties may be separated by reassignment or terminated from employment, at the discretion of the Company. If you become involved in a romantic relationship with a co-worker, please notify Human Resources.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship like persons who are related by blood or marriage (e.g., domestic partnership or civil union status).

## Background and Reference Checks

The Company recognizes the importance of maintaining a safe, secure workplace with employees who are qualified, reliable, and nonviolent, and who do not present a risk of serious harm to their coworkers or clients. To promote these concerns and interests, the Company reserves the right to investigate an individual's prior employment history, personal references, and educational background, as well as other relevant information. Consistent with legal or contractual requirements, the Company also reserves the right to obtain and to review an applicant's or an employee's criminal conviction record, and related information, and to use such information when making employment decisions, but only to the extent permissible under applicable law.

A pending criminal matter may be considered in appropriate circumstances for business-related reasons, consistent with applicable law. All background checks will be conducted in strict conformity with the federal Fair Credit Reporting Act (FCRA), applicable state fair credit reporting laws, and state and federal anti-discrimination and privacy laws. Consistent with legal or contractual requirements, HomeCentris

also reserves the right to obtain and to review an applicant's or an employee's criminal conviction record, and related information, and to use such information when making employment decisions, but only to the extent permissible under applicable law. Virginia maintains a specific list of offenses making you ineligible to work as a health care worker. That list of offenses is available in the HR Policy Manual.

## WORKPLACE CONDUCT

### Standards of Conduct

To assure safety and security and provide the best possible work environment, we expect employees to follow basic, common-sense rules of conduct that will protect everyone's interests and safety. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions of rules of conduct that may result in disciplinary action, including suspension, demotion, or termination of employment:

- Falsification of employment records, employment information or other records;
- Recording the work time of another employee, allowing any employee to record another employee's work time, or allowing falsification of any time card, whether yours or another employee's;
- Theft or the deliberate or careless damage of any Company property or the property of any employee or client;
- Use of Company materials, supplies, tools or products for personal reasons without advanced permission from management;
- Abuse of the Company's electronic resources, including sending personal emails during working time or in a manner that interferes with the employee's work performance;
- Possessing, distributing, selling, transferring or using or being under the influence of alcohol or illegal drugs in the workplace;
- Provoking a physical fight or engaging in physical fighting during working hours or on premises owned or occupied by the Company;
- Carrying firearms, weapons or dangerous substances at any time, on premises owned or occupied by the Company.

- Using abusive, violent, threatening or vulgar language during working hours or while on premises owned or occupied by the Company;
- Absence of two consecutive scheduled workdays without prior notice to the Company;
- Failing to obtain permission to leave work during working hours;
- Failing to observe work schedules, including any meal & rest breaks;
- Abusing or misusing paid sick leave (note: for employees subject to mandatory sick leave laws, the provisions of the applicable policy govern sick leave issues);
- Failing to provide a certificate from a health care provider when requested or required to do so in accordance with applicable law;
- Working overtime without authorization or refusing to work assigned hours;
- Violating any safety, health or security policy, rule or procedure of the Company; and
- Committing a fraudulent act or intentional breach of trust under any circumstances.

The major purpose of any disciplinary action is to correct the problem, prevent recurrence, and prepare the employee for satisfactory service in the future. By using progressive discipline, HomeCentris hopes that most employee disciplinary problems can be corrected at an early stage, benefiting both the employee and HomeCentris.

Disciplinary action may call for any of four progressive corrective action steps—first notice (documented verbal warning), second notice (first written warning), third notice (may include a suspension) discharge/termination of employment—depending on the severity of the problem and the number of occurrences. Progressive discipline means that, with respect to many disciplinary problems, these steps will normally be followed. However, there may be circumstances when one or more steps may be bypassed at the discretion of management.

There are certain types of employee misconduct or serious job performance deficiencies that may result in either a suspension or, in certain situations, termination of employment, without going through the progressive discipline steps. The Company reserves the right to determine which type of disciplinary action to issue in response to any type of performance issue or rule violation.

This statement of prohibited conduct does not alter or limit the policy of at-will employment. Nothing in this Policy is intended to limit any employee rights under the National Labor Relations Act.

## Code of Conduct--Compliance with Laws and Regulations

HomeCentris takes compliance with laws and regulations very seriously. This section is written as a general guideline and supports the HomeCentris Healthcare, LLC Compliance Plan. The full Compliance Plan is available on the HomeCentris SharePoint site or in any Agency.

As a health care company, HomeCentris has significant legal and ethical responsibilities. As such, we shall attempt to comply with all relevant laws, rules and regulations and adhere to the highest ethical standard in the conduct of our business.

### In General:

- We shall operate in accordance with all applicable laws and regulations at all levels of government.
- We shall not pursue any business opportunity that requires engaging in illegal or unethical activity. We shall promptly report violations of laws, regulations, standards, and Company policies and procedures.

### Employee Conduct:

- We shall perform our responsibilities in good faith, in a manner that is in the best interests of the Company and with the due care that a reasonable prudent person in the same position would use under similar circumstances.
- We shall avoid all illegal conduct, both business and personal.
- We shall avoid efforts to circumvent the law by devious means or questionable interpretations.
- We shall comply with all laws, rules, and regulations at all levels of government.
- We shall be open and honest in our business relationships with other employees of the Company.

### Ethical Practices:

- We shall maintain a high level of integrity in business conduct and avoid any conduct that could reasonably be expected to reflect

adversely upon the integrity of the Company, its officers, directors or other employees.

- We shall demonstrate honestly, integrity and excellence in performing our duties.

#### Environmental Laws:

- We shall promote sound corporate environmental and safety practices that will prevent and eliminate damage to the environment and enhance human and community resources.
- We shall comply with all applicable laws and regulations relating to the handling and disposal of hazardous substances and infectious waste while ensuring that contractors hired to dispose of such materials do so in an appropriate manner.

#### Anti-Trust Laws:

- We shall not engage in agreements or understandings with any competitor with regard to our prices or other terms and conditions, or with regard to product, service, territory or customer allocation that may constitute price-fixing or collusion of any type within our respective industry.

#### Political Contributions:

- We shall ensure that our personal political activities are lawful and separated from those of the Company.
- We shall ensure any political contributions are compliant with our Compliance Plan and all federal and state laws and regulations.

#### Integrity of Financial Reporting:

- We shall account for assets and liabilities properly and in compliance with applicable laws, regulations, standards, company policies and Generally Accepted Accounting Principles.
- We shall submit all reports to governmental authorities accurately, timely and in compliance with applicable laws and regulations governing such reports.
- We shall execute all transitions in accordance with management authorization and access to assets shall be permitted in accordance with such authorization.

- We shall report any financial transaction that may violate law, rule, regulation, company policy or the Standards of Conduct to the Company's Chief Financial Officer.

### Health Insurance Portability and Accountability Act ("HIPAA")

- HIPAA establishes standards for the protection of privacy regarding Protected Health Information ("PHI") and electronic Protected Health Information ("ePHI"). Government regulations define how this information may be used or disclosed to others. HomeCentris is required by law to maintain the privacy of protected health information for our patients/patients and employees.
- As an employee, make sure you discuss a patient's health information privately, respectfully, and only with those who need to know in order to provide health care. Only disclose information necessary to provide patient care or to assist other employees in providing appropriate care. Protect all information that pertains to patients or other employees, and don't leave this information in public view, on a computer screen, on a desk, or any unsecured area.
- Please refer any questions you may have regarding HIPAA to your manager, the Compliance Officer, or the CEO.

### Problem Resolution

We recognize that employees may have suggestions for improving our workplace, as well as complaints about the workplace. We feel the most satisfactory solution to a job-related problem or concern is usually reached through a prompt discussion with an employee's supervisor. Employees should feel free to contact their supervisors, another member of management, Human Resources, or the CEO with any suggestions and/or complaints.

While we provide employees with this opportunity to communicate their views, please understand that not every complaint can be resolved to the employee's satisfaction. Even so, we believe open communication is essential to a successful work environment and all employees should feel free to raise issues of concern without fear of reprisal.

## Confidential Company Information

The Company's confidential and proprietary information is vital to its current operations and future success. Each employee should use all reasonable care to protect or otherwise prevent the unauthorized disclosure of such information.

In no event should employees disclose or reveal confidential information within or outside the Company without proper authorization or purpose.

"Confidential Information" refers to a piece of information, or a compilation of information, in any form (on paper, in an electronic file, or otherwise), related to the Company's business that the Company has not made public or authorized to be made public, and that is not generally known to the public through proper means.

By way of example, confidential or proprietary information includes, all ideas, information, materials, tangible or intangible, not generally known to the public, relating in any manner to the business of the Company, its products and services (including all trade secrets), its officers, directors, and contractors, its actual and prospective customers, vendors and suppliers, and all others with whom it does business, its trade secrets, and financial information, including, without limitation, revenue sources, profit margins, pricing data, sales information, commissionable amounts payable with respect to sales revenue, individual facilities' profitability, operating income, operating expenses, gross profit charts, and profit-loss statements, project bid methods, price and cost data, pending projects and proposals, marketing or corporate strategies Employee learns or acquires during Employee's employment with the Company;

Nothing in this Employee Handbook prohibits an employee from communicating with any governmental authority or making a report in good faith and with a reasonable belief of any violations of law or regulation to a governmental authority, or disclosing Confidential Information which the employee acquired through lawful means in the course of his or her employment to a governmental authority in connection with any communication or report, or from filing, testifying or participating in a legal proceeding relating to any violations, including making other disclosures protected or required by any whistleblower law or regulation to the Securities and Exchange Commission, the Department of Labor, or any other appropriate government authority.

## Personal Appearance and Grooming, Office Staff

It is important for all HomeCentris employees to project a professional image while at work. Clothing must be consistent with a business environment and must be appropriate to the work being performed. Employees are expected to use good judgment in their appearance and grooming, keeping in mind the nature of the work, their own safety and the safety of co-workers, and their need to interact with the public.

All employees should be well-groomed, neat, and dressed appropriately for their job. HomeCentris has a “business-casual” dress code but some positions and situations may call for more formal attire. We may require a uniform for our nursing, therapy and caregiving staff. In addition, non-clinical must refrain from inappropriate attire such as unnecessarily revealing clothing whether at work or work-related functions directly or indirectly related to the business.

We encourage employees to seek the advice of their supervisor if they have questions regarding appropriate dress or appearance at work. Employees who report to work improperly dressed or groomed may be instructed by their supervisor to return home to change. The time that nonexempt employees are absent for this purpose will be unpaid unless state law requires otherwise.

Business casual dress policy is a benefit. Repeated deviations from the may require disciplinary actions, up to and including termination.

### **Religious, Medical and Disability Accommodations**

The Company will reasonably accommodate exceptions to this policy if required due to an employee's religious beliefs, medical condition or disability. Employees who need such an accommodation should contact their supervisor or Human Resources.

## Personal Appearance, Clinical Staff

Because we are providing health care services in a client’s home, we should always present our company and ourselves in the most professional manner possible. Therefore, HomeCentris clinical employees (nurses, therapists and primary care clinicians) will adhere to HomeCentris’ uniform policy.

Nurses: All nursing employees including RNs, LPNs, CNAs, HHAs and any other nursing staff making a home visit will wear appropriately fitting, HomeCentris-approved scrubs, both tops and bottoms.

Therapists: All therapists and therapy assistants will wear appropriately fitting, HomeCentris-approved polo shirts and khaki pants.

Primary Care Staff: All primary care staff including MDs, Nurse Practitioners, Physicians Assistants and any other treating primary care practitioners shall wear the HomeCentris approved lab coats when making office visits or home visits.

In addition to the above uniform standards, employees are expected to use good judgment in their appearance and grooming, keeping in mind the nature of the work, their own safety and the safety of co-workers, and their need to interact with the public. Staff safety and productivity dictates clinical staff shall not wear:

- Flip flops, hiking shoes, open-toe shoes,
- Open-heel shoes not having a strap around the heel,
- Shoes not having a non-slip sole,
- Crocs with holes in the toe area,
- Spiked jewelry or hairstyles,
- Dangling jewelry or earring “hoops” larger than the size of a quarter in diameter,
- Hair longer than shoulder-length that is not pulled up and/ or away from face and securely fastened,
- Fingernails longer than ¼” from fingertip.

We encourage employees to seek the advice of the Agency Administrator if they have questions regarding appropriate dress or appearance at work. Employees who report to work improperly dressed or groomed may be instructed by their supervisor to return home to change. The time that nonexempt employees are absent for this purpose will be unpaid unless state law requires otherwise. Deviations from HomeCentris’ Personal Appearance Policy may impose disciplinary actions, up to and including termination of employment.

### **Religious, Medical and Disability Accommodations**

The Company will reasonably accommodate exceptions to this policy if required due to an employee's religious beliefs, medical condition or

disability. Employees who need such an accommodation should contact their supervisor or Human Resources.

## Attendance and Punctuality

To maintain a safe and productive work environment, the Company expects employees to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on the Company and will result in disciplinary action.

## PAY PRACTICES

### Payment of Wages

Employees will be paid by check, direct deposit, or pay card. Each pay period covers two weeks. You will be paid on the schedule set by your manager. If the regular payday falls on a company-recognized holiday, then employees will be paid on the work day after the regular payday unless applicable law requires otherwise. Employees who elect to use electronic direct deposit will receive a deposit advice on each payday.

For security and convenience, we encourage you to arrange for the direct deposit of your paychecks. If your paycheck is lost or stolen, contact your payroll representative immediately. We will attempt to put a stop-payment notice on the check. Once we receive confirmation the stop payment was successful, we will issue a new check.

HomeCentris is required by law to make certain deductions from employees' paychecks each time they are prepared, including but not limited to, federal, state, and local income taxes, federal and state disability insurance, and contributions to Social Security and Medicare. The tax deductions will depend on your earnings and on information you furnish on W-4 forms and State withholding forms. If you fail to submit a W-4 form, HomeCentris will assign the employee as single with zero exemptions. We may also withhold additional deductions from your paychecks for contributions to voluntary benefits programs. The amount of all deductions will be listed on the employee's pay stub. If you have questions concerning why deductions were made from your paycheck or how they were calculated, contact your payroll representative.

## Overtime Pay

All non-exempt employees are eligible for overtime pay in accordance with applicable law. Exempt employees are not eligible for overtime pay. If an employee is unclear if he/she qualifies for overtime pay, they should speak to his or her manager or Human Resources.

Employees will be paid at straight time for all hours worked up to and including the fortieth (40th) hour worked in any given work week. Employees will be paid one and one-half (1½) times his/her regular hourly rate of pay for all hours worked in excess of the fortieth (40th) hour in any given work week, or in accordance with the law of the state in which you work. Non-exempt employees are responsible for accurately reporting all time worked, including overtime hours.

All overtime must be approved by your supervisor in advance of an employee working any overtime hours. Non-exempt employees must inform their supervisor when they realize they may work overtime for that work week. Non-exempt employees will be paid for all overtime work, but may be subject to disciplinary action up to and including termination of employment if the overtime work was not pre-authorized.

For purposes of determining whether non-exempt employees are entitled to overtime pay, only hours worked during a work week will be counted. Paid time off, and other circumstances in which employees receive payment other than for the actual performance of work are, will not be counted as hours worked for overtime calculations, with the exception of periods of time during these categories of time when the non-exempt employee performed actual work on behalf of the Company. For overtime pay calculation purposes, the work week begins at 12:00 midnight on Sunday and ends at 11:59pm on Saturday.

Exempt employees are expected to work as much of each workday as is necessary to complete their job responsibilities. No overtime or additional compensation is provided to exempt employees.

## Work Schedules and Authorized Hours

The regular workweek for all full-time, hourly, regular office administrative employees is forty hours, divided into five days, Monday through Friday, with full-time employees scheduled to work eight hours per day, not including an unpaid meal break of up to 30 minutes. The actual start and end to the work day shall be defined by on-site

management based on patient requirements or other business issues. Part-time employees' working hours and schedules will be arranged by supervisors. Salaried or non-exempt employees are not compensated by the hour and are expected to work the hours needed to complete their responsibilities.

Your daily and weekly work schedules may be changed from time to time at the discretion of management to meet the varying condition of our business and in accordance with patient requirements. We will announce changes in work schedules as far in advance as practicable.

Based on patient needs/requests, other urgent needs of the business, or employee personal business, you may have variations in starting and ending times, as well as variations in total hours that may be scheduled each day and week. In these cases, you may be required to adjust your schedule on another work day in the same workweek to arrive at your normal weekly hour expectation. This situation must be pre-approved by your supervisor and must be made up within that calendar week.

Any time worked in excess of your approved work schedule must be approved by your supervisor in advance of an employee working any additional hours. Non-exempt employees will be paid for all time worked, but may be subject to disciplinary action up to and including termination of employment if the time work was not pre-authorized.

### [Working with Clients in Fixed Authorization Programs](#)

Many caregivers work with clients who are participating in a commercial, governmental, or institutional fixed-authorization program ("FAP"), including but not limited to Medicaid Waiver Programs.

FAPs authorize only a certain number of caregiver hours per work week per client and will not, under any circumstances, pay HomeCentris for any hours in excess of those authorized hours. The Company does not receive any benefit, financial or otherwise, for any time a caregiver spends with a FAP client beyond the authorized weekly hours.

Caregivers are not authorized or permitted to perform any work for a FAP client beyond the authorized weekly hours. This policy addresses situations in which a caregiver spends time with a client beyond the hours specifically authorized by the applicable FAP or may incorrectly clock in or out in excess of the authorized hours.

You must notify HomeCentris if you exceed the authorized hours in a work week. The Company may credit such excess hours to caregivers only if, in its sole discretion, the excess time was warranted for issues including, but not limited to, health emergencies, safety issues, weather conditions, and temporary FAP authorizations. Without such exceptions, the Company shall adjust any excess work hours to the number of hours then authorized. Caregivers who continually violate the company's time and attendance policies will be subject to disciplinary action, up to and including termination.

## Recording Work Hours for Non-Exempt Employees

HomeCentris will compensate its non-exempt employees in accordance with all applicable state and federal laws.

### Non-exempt office employees

Non-exempt office employees must accurately and timely record all hours worked for payroll processing. Time recording for non-exempt office employees is accomplished by either electronic timeclock or paper time sheets depending on the company and location. Your supervisor will train you on the correct timekeeping procedures.

For non-exempt office employees, 30-minute meal periods are deducted automatically each day. You are able to leave the premises during your meal period. You are not to perform any work while you are on your meal period and should be free from all work duties.

If your meal period is interrupted or missed for any reason such that you do not receive an uninterrupted 30-minute meal period, it is your responsibility to notify your supervisor as soon as possible but no later than the end of your shift so that you will be paid for your work time.

Failure to take meal periods per this policy is a compliance issue and may result in discipline, up to and including termination of employment.

### Non-exempt Caregivers

Non-exempt caregivers must accurately and timely record and report all hours worked for payroll processing. The Company uses electronic visit verification systems ("EVV") for most assignments. Your supervisor will train you on the correct timekeeping procedures for our applicable EVVs. Caregivers must clock-in via the EVV before performing any work-related

activity at their assignment and must complete all work-related activities at the assignment before clocking out using EVV. This technology mostly eliminates time-slips for timekeeping and allows the office to know when the caregiver arrives at and leaves a client's home. If the caregiver cannot call from the client's phone because it is in use, call as soon as the phone is free, and then call the supervisor who will speak with the client to verify the actual arrival time.

It is important caregivers timely report any working time not otherwise captured via the EVV on the Time Certification for Non-Visit Time log. This may include, but is not limited to time working in the Company office, time spent on training, time spent in in-service education, time spent in orientation or staff meetings, and all hours of work not otherwise reported in EVV. If a caregiver is working on a live-in, a shift of 24-hours or more, interruptions to the caregiver's sleeping period must be reported to HomeCentris

### “Off the Clock” Work

The Company is committed to compensating every employee for all work performed in accordance with all applicable state and federal laws. HomeCentris prohibits employees from working “off the clock.” “Off-the-clock” work means work a non-exempt employee performs but fails to report to the Company. Non-exempt employees may not perform any work without compensation.

Examples of prohibited off-the-clock work include but are not limited to:

- Performing work-related activities before a non-exempt employee has started recording work time or after he or she has stopped recording work time;
- Working on-call and not recording or reporting the hours of work;
- Working overtime hours (whether pre-approved by a supervisor or not) and failing to record those hours;
- Completing work-related paperwork at home without recording or reporting the time; and
- Sending or responding to work-related e-mails or making or responding to phone calls without reporting the time worked.

Non-exempt employees who perform work while not clocked/signed in, must track all time worked and immediately report that time to the

employee's manager. Your supervisor will train you on the correct timekeeping procedures, including the proper method to certify all of the hours worked. The Company pays non-exempt employees for all working time, even if the work performed was not initially reported in the Company's timekeeping system or on a timesheet. Therefore, if a non-exempt employee determines he or she is not paid for work, he or she must follow the reporting procedure set forth in the section titled "Reviewing Your Pay Stub, Reporting Errors, and Obtaining More Info."

## On-Call Pay

To ensure the Company can address after hours issues, the Company has instituted an on-call compensation policy to cover those nonexempt employees who may be required to be on-call and/or come back into work following their regularly scheduled shift. Exempt employees are not eligible for "on-call" pay.

During the on-call period, employees will not be required to report to work and may perform on-call work remotely. Employees are free and encouraged to engage in personal activities during the on-call period. However, the Company asks that the employee refrain from the use of drugs and alcohol to ensure soundness of judgment.

Employees will be paid for their on-call/call-in time. Nonexempt on-call employees will be paid at their normal rate of pay for any time actually worked while on-call. On-call hours will only count as hours worked if the employee is required to actually work while on-call. Employees will be paid any applicable overtime rate if the time spent working on-call qualifies as overtime.

Employees who are not required to perform any work during their on-call shift will be paid a flat on-call rate for being on-call. Because this premium payment is not for work actually performed, the on-call hours will not count as hours worked for the purpose of overtime.

## Reviewing Pay Stubs, Reporting Errors, and More Information.

HomeCentris works hard to ensure all employees are paid correctly, but mistakes can happen. When mistakes do occur, and are brought to our attention, HomeCentris will promptly make any corrections necessary. It is your responsibility to review each paycheck/pay stub when you receive it to make sure your pay and hours are correct.

If you believe an error has occurred or have questions about your paycheck, pay stub, deductions, or if your pay does not accurately reflect your hours worked, you should promptly report the matter to your supervisor or the payroll representative. If your supervisor or payroll representative is unavailable, if you believe it is inappropriate to contact those persons, or if you have not received a prompt and acceptable reply from them, you should immediately contact Human Resources. Every report will be fully investigated and HomeCentris will strive to ensure you receive the pay to which you are entitled. If you have not received a satisfactory response within five business days reporting, please contact the Compliance Hotline at 888-739-0965.

If the Company concludes an employee has violated this policy, corrective action will be taken, where appropriate, up to and including termination.

## Travel Time

The Company will compensate non-exempt employees for time spent traveling for purposes of conducting the Company's business in compliance with applicable local, state, and federal law. This compensation is for the time the non-exempt employee spends traveling and does not include mileage, which may be compensated separately.

Compensable travel time includes a non-exempt employee's business travel between work sites during the workday, but does not apply to time spent in the employee's regular commute to work, which includes travel from home to the first work site at the beginning of the workday and travel from the last work site to home at the end of the workday, unless applicable law requires otherwise.

For non-exempt employees, time spent traveling between work sites during the workday is counted as hours worked for purposes of calculating hours of work and overtime premiums and eligible non-exempt employees will be paid overtime in accordance with applicable federal and state law.

Non-exempt employees are not expected or authorized to accept or make calls or complete any paperwork before they begin their commute or after they finish their commute. Any work that is approved for non-exempt employees to do at home can be done on their own schedule. There is no work that non-exempt employees will be asked to do immediately before or immediately after their commute.

All compensable travel time will be calculated by Company software using Google Maps to calculate the distance and time between clients. This time will be included on your pay stub. It is your responsibility to track your travel time, reconcile it against the Travel Time on your pay stub, and notify the payroll department if it is incorrect.

Failure to adhere to this policy, including failure to record all compensable travel time and failure to record all work will be addressed as a performance issue and the employee will be subject to discipline, up to and including termination from employment.

## Exempt Employees

Exempt employees are paid on a salary basis meaning the employee regularly receives a predetermined amount of compensation each pay period regardless of variations in the quality or quantity of the employee's work. In general, an exempt employee will receive his or her salary for any week in which the employee performs any work, regardless of the number of days or hours worked. However, an exempt employee will not be paid for time not worked as follows:

- When an exempt employee takes one or more full days off for personal reasons other than sickness or disability, the employee will not be paid for such day(s) of absence, but the employee may use available PTO to make up for the reduction in salary;
- When an exempt employee takes one or more full days off from work due to sickness or disability, the employee will not be paid for such day(s) of absence, but the employee may use available PTO to make up for the reduction in salary;
- Penalties imposed in good faith for infractions of safety rules of major significance;
- Unpaid disciplinary suspensions of one or more full days imposed in good faith for infractions of workplace safety or conduct rules;
- When an exempt employee works only part of the week during his or her first and last week with the Company, the employee will be paid only for the days actually worked; and
- When an exempt employee takes unpaid leave under the Family and Medical Leave Act or corresponding laws, the Company will not pay for such days/hours of absence.

The Company may require an exempt employee to use available PTO, when the employee takes less than a full-day off from work.

HomeCentris will not allow any form of retaliation against individuals who make good faith reports of alleged violations of this Pay Practices policy, or who cooperate in the Company's investigation of such reports, even if the reports do not reveal any errors or wrongdoing.

## BENEFITS

### Health and Ancillary Benefits

HomeCentris currently offers all full-time, regular employees with a choice of health benefits. One of the major advantages of the HomeCentris Benefits Program is designing a program to meet your individual needs. You can select from medical, dental, and vision care options, supplemental life insurance, accidental death and dismemberment ("AD&D") insurance, short-term and long-term disability coverage.

HomeCentris presently shares in the cost of employee medical, prescription drug, dental, vision, basic life and long-term disability insurance. These plans are offered to your family members, at your cost. Voluntary short-term disability and supplemental life insurance are offered at your expense.

Payroll deductions for medical (including prescription drugs), dental, and vision benefits are taken on a pre-tax basis, decreasing the amount employees pay in income taxes. All other benefits elected will be deducted on a post-tax basis.

All caregivers are eligible for health benefits, regardless of hours worked. For non-caregivers, employees are eligible to participate in the HomeCentris Benefits Program if they are a regular, full-time employee with standard hours of at least 30 hours per week.

HomeCentris reserves the right to amend or cancel its benefits programs and contributions, if any, at any time.

You are eligible after sixty (60) days of continuous employment from your hire date. If you do not enroll within forty-five (45) days of becoming eligible, you must wait until the open enrollment window at the end of

each calendar year, unless a qualifying life event occurs during the year. Qualifying life events include:

- Losing healthcare coverage you previously had,
- You have acquired a new dependent (through marriage, birth or adoption) and wish to cover that dependent

If you have a Qualifying Life Status Change, you must enroll yourself and eligible dependents within thirty (30) days of the change, or wait until the next open enrollment period. During any approved leave of absence (FMLA, Workers Compensation, Short-Term Disability, Long-Term Disability, other approved unpaid leave), employees are required to continue making their normal benefits contributions in order to maintain their benefits. If PTO or other paid leave is substituted for FMLA leave, HomeCentris will continue to pay the employee's contribution towards group health benefits through a payroll deduction, assuming sufficient funds are available.

## Workers' Compensation

When work-related accidents, injuries or illnesses occur, employees may be eligible for workers' compensation insurance benefits. The Company provides a comprehensive workers' compensation insurance program at no cost to employees and in accordance with applicable state law. This program covers most injuries or illnesses, sustained in the course of employment, that require medical, surgical, or hospital treatment. Subject to legal requirements, workers compensation insurance provides benefits or, if the employee is hospitalized, treatment immediately.

### Reporting Work-Related Injury or Illness

Employees who sustain a work-related injury or illness should inform their supervisor immediately. No matter how minor an on-the-job injury may appear or where it may occur, it is important that it be reported immediately to allow an eligible employee to qualify for coverage.

### Leaves of Absence/Accommodation

Employees who need to take time off from work due to a workers' compensation illness or injury may also be eligible for a leave of absence under the Company's leave of absence policies. Employees should consult Human Resources for additional information.

## Return to Work

Employees ready to return to work following a workers' compensation-related leave of absence must supply a certification from a health care provider confirming the employee's ability to return to work.

HomeCentris has a transitional return to work program. This program is mandatory for all work-related injuries, is temporary, and is an alternative to full duty. An employee, who fails to report to work when released for full, partial or transitional duty by an attending physician, has voluntarily resigned and may lose workers' compensation benefits as a result.

## Fraud

The Company will notify the workers' compensation insurance company if we have reason to believe an employee has supplied false or misleading information about a claim and/or has filed a fraudulent claim. Workers' compensation fraud is a crime and may also be grounds for disciplinary action, up to and including termination of employment.

## Wage Garnishments

When required by law, HomeCentris may garnish your wages to comply with a court ordered repayment. If you receive an order to garnish your wages, you must present it to our payroll department immediately. HomeCentris will process the garnishment in accordance with state limitations withhold the required amount of your wages, and remit the money to the appropriate agency.

## TIME OFF AND LEAVES OF ABSENCES

### Paid Time Off

***(This policy does not apply to non-exempt caregiver positions including caregiver, certified medication technician, certified nursing assistants and geriatric nursing assistants.)***

HomeCentris will provide Paid Time Off ("PTO") to eligible employees. PTO is a comprehensive paid-leave program and combines traditional vacation and sick time into a single benefit.

The "PTO year" will begin January 1 and will end on December 31. That means you start over on January 1 and begin accruing PTO again.

HomeCentris provides PTO because it believes all employees should take time off and we encourage employees to use their PTO. However, employees may carry over a maximum of sixty-four (64) hours of PTO, or 40 service units for clinicians paid by the unit, into the following PTO year. There will be no accommodations given to staff if year-end PTO requests are denied due to patient needs. Both employees and managers are responsible for monitoring accrued PTO balances and using it before year end. Lost accrued PTO is not a HomeCentris obligation.

You accrue PTO based upon your job title and length of service. Eligible employees will accrue PTO based upon months of service completed from their hire date. Accrual rates for PTO are based on regular hours paid, which includes PTO hours taken in any given pay period. Your starting PTO Level is specified your job descriptions.

<b>Level</b>	<b>Length of Service</b>	<b>PTO Earned Per Hour Worked</b>	<b>Annual PTO Days Equivalent</b>
Level 1	0-36 Months	.05769	15
Level 2	37-72 Months	.06538	17
Level 3	72+ Months	.07692	20

PTO use is not included as “time worked” for purposes of calculating overtime. Overtime hours worked are considered regular, straight time hours for purposes of calculating PTO earned. In other words, you will not accrue PTO at 150% of regular accrual rates during overtime hours.

You must request PTO from your supervisor as far in advance as possible. Requests for consecutive PTO days shall require a minimum of two weeks’ notice. Approval of PTO requests is within the sole discretion of the supervisor and will be granted as the schedule permits. This discretion includes year-end PTO days requested to use accrued PTO.

PTO days must be used with all unpaid leaves of absence, including but not limited to, a personal leave of absence or a leave under the Family and Medical Leave Act until the PTO is exhausted. PTO cannot be used concurrently with other paid leaves of absence, including but not limited to, short-term or long-term disability. PTO cannot be used to extend a leave beyond the applicable time limits. (Example: Employee has a serious illness that qualifies him for up to 12 weeks of leave under the FMLA. At the time of qualifying for an FMLA leave of absence, the

employee has accrued five days of PTO. The employee is required to use all five days of PTO during the first five days of his FMLA leave.)

## Corporate Holidays

The Company offers paid time off for the observance of specific holidays each calendar year to employees who primarily perform work duties at HomeCentris' corporate headquarters, a central billing office, or from a home-based office, or a clinician with the following title: RN, LPN, PT, PTA, OT, COTA, and ST. Typically, the Company observes the following paid holidays:

- New Year's Day
- Presidents' Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day
- Floating Holiday

Floating holidays are not PTO. They are for the observance of a holiday not included above or a special event. As such, you must request, in writing, your floating holiday at least 30 days in advance and your supervisor must approve your request so they can cover your absence. An unused Floating Holiday may not be carried to the following calendar year and will not be paid upon separation of employment.

NOTE: If a holiday falls on a weekend day, the Company observes the holiday on the preceding Friday for Saturday holidays or the following Monday for Sunday holidays

To be eligible to receive holiday pay, employees must be full-time (30 hours or more/week).

In addition, to be eligible to receive holiday pay, eligible employees must work the day preceding and the day following the holiday, unless the eligible employee uses PTO. If a holiday occurs during the eligible employee's PTO leave, the PTO day on the corporate holiday will be counted as a holiday rather than PTO.

Employees who are on a continuous leave of absence are not eligible to receive holiday pay. New hires who have not completed 90 days of employment are not eligible for holiday pay.

For the safety of our patients and at the discretion of your supervisor, you may be asked to work on the above holidays. If so, you will be granted a floating holiday.

Eligible nonexempt employees who perform any work on paid company holidays will be paid for all time worked in addition to any holiday pay. Holiday pay for nonexempt employees is calculated based on the employee's straight time pay rate (as of the date of the holiday) multiplied by the number of hours the employee would have otherwise worked on that day. Holiday pay is not counted for the purpose of calculating an employee's overtime hours of work or overtime premiums.

## Family Medical Leave Act ("FMLA")

Employees may be entitled to a leave of absence under FMLA. The full detail of FMLA is beyond the scope of this handbook. This section provides summary information concerning FMLA entitlements and obligations employees may have during such leaves. If you have questions concerning FMLA, contact Human Resources or access the full policy in any agency or on the web at [www.homecentris.com/careers](http://www.homecentris.com/careers).

### Employees Eligible for FMLA Leave

FMLA leave is available to eligible employees. To be an eligible, an employee must: (1) have been employed by HomeCentris for at least 12 months (which need not be consecutive); (2) have been employed by HomeCentris for at least 1250 hours of service during the 12-month period immediately preceding the leave; and (3) be employed at a site where 50+ employees are located within 75 miles of the worksite.

### Employee Entitlements for FMLA Leave

The FMLA provides eligible employees with a right to leave, health insurance benefits and, with some limited exceptions, job restoration.

#### 1. Basic FMLA Leave Entitlement

The FMLA provides eligible employees up to 12 workweeks of unpaid leave during a rolling 12-month period. Leave may be taken for any one, or for a combination, of the following reasons:

- o To care for the employee's child after birth, or placement for adoption or foster care,
- o To care for the employee's spouse, son, daughter or parent (but not in-law) who has a **"serious health condition,"**
- o For the employee's own **"serious health condition"** (including any period of incapacity due to pregnancy, prenatal medical care

or childbirth) that makes the employee unable to perform one or more of the essential functions of the employee's job

- o Because of any **qualifying exigency** if an employee's spouse, son, daughter or parent is a covered military member who is a member of a regular component of the Armed Forces on active duty or has been notified of an impending call or order to active duty status for deployment to any foreign country in the regular or reserve components of the Armed Forces, including the National Guard or Reserves

The applicable "12-month period" utilized by the Company is the rolling forward method. This is a 12-month period measured forward from the start date of the employee's first FMLA leave.

See full policy for definitions of **serious health condition, qualifying exigencies, and covered service member**.

## 2. Additional Military Family Leave Entitlement (Injured Service Member Leave)

An eligible employee who is the spouse, son, daughter, parent or next of kin of a covered service member is entitled to take up to 26 weeks of leave during a single 12-month period to care for the service member with a serious injury or illness (see full policy).

### Intermittent Leave and Reduced Leave Schedules

FMLA leave is usually taken for a period of consecutive days, weeks, or months. However, employees also are entitled to take FMLA leave intermittently or on reduced leave schedule when medically necessary. Employees may not take FMLA leave on an intermittent or reduced basis for the birth, adoption, or placement for foster care of a child.

### Protection of Group Health Insurance Benefits

During FMLA leave, eligible employees are entitled to receive group health plan coverage on the same terms and conditions as if they had continued to work. To the extent that FMLA leave is unpaid because an employee has no accrued PTO, the employee must make arrangements to pay any employee contribution toward such benefits.

### Restoration of Employment and Benefits

At the end of FMLA leave, subject to some exceptions, employees generally have a right to return to the same or equivalent positions with equivalent pay, benefits and other employment terms. HomeCentris will notify employees if they qualify as “key employees” (see full policy), if it intends to deny reinstatement, and of their rights in such instances. Use of FMLA leave will not result in the loss of any employment benefit that accrued prior to the start of an eligible employee’s FMLA leave.

#### Notice of Eligibility for, and Designation of, FMLA Leave

Employees requesting FMLA leave are entitled to receive written notice from HomeCentris telling them whether they are eligible for FMLA leave and, if not eligible, the reasons why they are not eligible. When eligible for FMLA leave, employees are entitled to receive written notice of: 1) their rights and responsibilities; 2) HomeCentris’ designation of leave as FMLA-qualifying or non-qualifying, if not FMLA-qualifying, the reasons why; and 3) the amount of leave, if known, that will be counted against the employee’s leave entitlement.

#### Employee FMLA Leave Obligations

To trigger FMLA leave protections, employees must inform HomeCentris of the need for FMLA-qualifying leave and the anticipated timing and duration, if known.

Calling in “sick,” without providing the reasons for the needed leave, will not be considered sufficient notice for FMLA leave under this policy. Employees must respond to HomeCentris’ questions to determine if absences are potentially FMLA-qualifying.

If employees fail to explain the reasons for FMLA leave, the leave may be denied. When employees seek leave due to FMLA-qualifying reasons for which HomeCentris has previously provided FMLA-protected leave, they must specifically reference the qualifying reason for the leave.

##### 1. Timing of Employee Notice.

Employees must provide 30 days’ notice of the need to take FMLA leave when the need is foreseeable. When 30 days’ notice is not possible, employees must provide HomeCentris notice of the need for leave as soon as practicable under the facts and circumstances of the particular case. Employees, who fail to give a 30-day notice for foreseeable leave without a reasonable excuse for the delay, or

otherwise fail to satisfy FMLA notice obligations, may have FMLA leave delayed or denied.

## 2. Cooperate in the Scheduling of Planned Medical Treatment (Including Accepting Transfers to Alternative Positions) and Intermittent Leave or Reduced Leave Schedules.

When planning medical treatment, employees must consult with HomeCentris and make a reasonable effort to schedule treatment so as not to unduly disrupt HomeCentris' operations, subject to the approval of an employee's health care provider. If employees neglect to fulfill this obligation, HomeCentris may require employees to attempt to make such. Upon request, employees must advise HomeCentris why such leave is medically necessary.

HomeCentris may temporarily transfer employees, during intermittent or reduced leave schedules, to alternative positions with equivalent pay and benefits for which the employees are qualified and which better accommodate recurring periods of leave.

## 3. Submit Certifications Supporting Need for FMLA Leave

**Medical Leave:** Depending on the FMLA leave sought, employees may be required to submit medical certifications supporting their need for leave. There generally are three types of FMLA medical certifications: initial, recertification, and return to work.

It is the employee's responsibility to provide HomeCentris with timely, complete, and sufficient medical certifications. When HomeCentris requests such certifications, employees must provide the certifications within 15 calendar days, unless it is not practicable to do so despite an employee's diligent, good faith efforts. HomeCentris will deny FMLA leave to employees who fail to timely cure deficiencies or submit requested certifications.

**Military Family Leave:** When employees seek leave due to qualifying exigencies arising from active duty status of covered military members, HomeCentris may require employees to provide: 1) a copy of the active duty orders or other documentation issued by the military; and 2) a certification from the employee setting forth information concerning the nature of the qualifying exigency for which leave is requested. Employees shall provide a copy of new active duty orders or other documentation issued by the military for leaves arising out of qualifying exigencies arising out of a different

active duty or call to active duty status of the same or a different covered military member.

Any employee who is a volunteer member of the Virginia Civil Air Patrol shall be entitled to take up to ten (10) days of leave per federal fiscal year for training for emergency missions with the Civil Air Patrol and up to thirty (30) days of leave per federal fiscal year for responding to an emergency mission as a Civil Air Patrol volunteer. All leave under this policy shall be unpaid. Employees may, but are not required to, choose to use any accrued paid leave concurrently with the leave available under this policy, but an employee's use of paid leave will not increase the total amount of available Civil Air Patrol leave.

#### 4. Substitute Paid Leave for Unpaid FMLA Leave

Employees must use any accrued PTO while taking unpaid FMLA leave. The substitution of PTO for unpaid FMLA leave time does not extend the length of FMLA leaves and the PTO will run concurrently with an employee's FMLA entitlement until the employee's accrued paid leave is exhausted.

Leaves of absence taken regarding a disability leave plan or workers' comp injury/illness shall run concurrently with any FMLA leave entitlement. Upon request, HomeCentris will allow employees to use accrued PTO to supplement any paid disability benefits.

#### 5. Pay Employee's Share of Health Insurance Premiums

During FMLA leave, employees are entitled to continued group health plan coverage under the same conditions as if they had continued to work including the same employer and employee contributions towards premiums. Unless HomeCentris notifies employees of other arrangements, whenever employees are receiving pay from HomeCentris during FMLA leave, HomeCentris will deduct the employee portion of the group health plan premium from the employee's paycheck. If FMLA leave is unpaid, employees must pay their portion of the group health premium.

#### 6. Coordination of FMLA Leave with Other Leave Policies

The FMLA does not affect any federal, state, or local law prohibiting discrimination, or supersede any State or local law which provides greater family or medical leave rights. Questions and/or Complaints about FMLA Leave

If employees have questions regarding this FMLA policy, please contact Human Resources. HomeCentris is committed to complying with the FMLA and, whenever necessary, shall interpret and apply this policy in a manner consistent with the FMLA.

#### 7. Confidentiality

Documents relating to medical certifications, re-certifications or medical histories of employees or employees' family members will be maintained separately and treated by the Company as confidential medical records, except that in some legally recognized circumstances, the records (or information in them) may be disclosed to supervisors and managers, first aid and safety personnel or government officials.

#### 8. Fraudulent Use of FMLA Prohibited

An employee who fraudulently obtains FMLA from HomeCentris is not protected by FMLA's job restoration or maintenance of health benefits provisions. In addition, the Company will take all available disciplinary action against such employee due to such fraud.

### Bereavement Leave

Eligible employees may take up to three consecutive days of PTO to attend the funeral and make any necessary arrangements due to the death of an immediate family member, except where allowed additional time off for bereavement under applicable state law. "Immediate family" consists of a spouse, child, father, father-in-law, mother, mother-in-law, son-in-law, daughter-in-law, brother, sister, stepfather, stepmother, stepbrother, stepsister, stepson or stepdaughter. All regular full-time employees working a minimum of 30 hours per week are eligible for bereavement leave. Virginia Caregivers are not eligible for this benefit.

Employees must notify their supervisor as soon as possible for bereavement leave. Approval of bereavement leave will occur unless an unusual business need or staffing requirement arises. An employee may, with supervisor approval use any available paid leave for additional time off beyond three days as necessary.

## Jury and Witness Duty Leave

HomeCentris recognizes the civic responsibility of jury duty by permitting time off when an employee is summoned. Employees are encouraged to serve on jury duty and will not be penalized, terminated, or disciplined due to their service. You must submit proof of summons.

The Company will comply with all laws regarding pay for jury leave. Time spent engaged in attending court for prospective jury service or for serving as a juror is not compensable except that exempt employees will not incur any reduction in pay for a partial week's absence due to jury duty. Employees will not be required to use sick leave or vacation for time spent responding to a summons and/or subpoena, for participating in the jury selection process, or for serving on a jury.

Employees excused from jury or witness duty before the halfway point of their scheduled workday are required to contact their supervisor to find out if they should report for work.

All employees are allowed unpaid time off if summoned to appear in court or for a deposition unrelated to HomeCentris. Non-exempt employees may use accrued PTO or take time off without pay. Exempt employees will be paid their normal salary during any workweek in which they appear as a witness and also perform services for HomeCentris, regardless of the amount of time performing services.

If you are required to provide a deposition on behalf of HomeCentris, or industry-related for other healthcare providers, the time spent for the deposition will be paid by HomeCentris as regular work hours. Pay for, and attendance at, a deposition does not count toward calculation for overtime, PTO, or premium pay.

## Time Off: Election Officer

Employees will be allowed time off from work to serve as an election officer, a member of a local electoral board or an assistant general registrar. Employees must provide their supervisor with reasonable notice of the need for leave.

Time off for election officer leave will be unpaid except that exempt employees may receive pay, as required by applicable law. Employees

will not be required to use paid time off due to service at a polling place on Election Day or a meeting to determine election results.

### Crime Victim Leave

An employee who is the victim of a crime may take leave to be present at any criminal proceedings relating to a crime against the employee, provided the employee provides HomeCentris with a copy of the crime victim rights form received from law enforcement with respect to the proceedings and the notice of each scheduled criminal proceeding. All leave under this policy shall be unpaid, except that exempt employees will not incur any reduction in pay for a partial week's absence to appear as a witness. See the HR Manual for eligibility requirements.

The Company reserves the right to deny leave under this policy to the extent that the leave creates an undue hardship to the Company's business.

## WORKPLACE HEALTH AND SAFETY

### Emergency Management

#### Field, Caregiver and Clinical Employees.

In cases of emergency, clinicians and caregiver employees should adhere to the emergency preparedness or disaster plan in effect at your location. Additional information can be obtained through the Administrator or Agency Director. For weather related emergencies, you will follow the Emergency Management Plan (EMP) specific to your Agency.

#### Corporate Employees.

In cases of emergency, HomeCentris corporate employees (non-nursing, non-therapy, non-caregiver staff) should adhere to the emergency preparedness or disaster plan in effect at their agency office.

For weather-related emergencies, staff will follow the closing or delayed opening guidance from the county government where their agency is located. Employees are expected to work from home during office closures or delays to ensure adequate coverage of customer and patient needs. If your county government is not closed and you wish to remain home due to inclement weather, you may use accrued PTO or remain home without pay. When choosing to remain home, you must contact

your supervisor to be eligible. Employees may not use PTO in excess of their available balance during periods inclement weather and in such cases, will not be paid for time missed. Employees who violate the call-off policy may be subject to further disciplinary action, up to and including termination from employment.

## Drug & Alcohol-Free Workplace

HomeCentris is committed to providing a drug and alcohol-free workplace. HomeCentris has a responsibility to its employees, business visitors, clients, and customers to provide a safe, secure, and efficient working environment. Drug and alcohol abuse can seriously endanger safety and undermine our commitment to quality and excellence.

### Drug Use/Distribution/Possession/Impairment

HomeCentris strictly prohibits the use, sale, attempted sale, conveyance, distribution, manufacture, purchase, attempted purchase, possession, cultivation and/or transfer of illegal drugs or other unlawful intoxicants at any time, and in any amount or any manner, regardless of occasion. "Illegal drugs" means all drugs whose use or possession is regulated or prohibited by federal, state or local law. These include prescription medication that is used in a manner inconsistent with the prescription or for which the individual does not have a valid prescription. Marijuana remains illegal as a matter of federal law and therefore its use or possession violates this policy. The Company will endeavor to accommodate individuals with disabilities but will not accommodate the use of medical marijuana at work or excuse policy violations related to medical marijuana.

Employees are also prohibited from having any such illegal or unauthorized controlled substances in their system while at work. Included within this prohibition are lawful controlled substances that have been illegally or improperly obtained.

As required by Virginia law, the Company will not discharge, discipline, or discriminate against an employee based upon the employee's lawful use of cannabis oil, as that term is defined by Virginia law, pursuant to a valid written certification issued by a practitioner for treatment or to eliminate the symptoms of the employee's diagnosed condition or disease. Nothing in this policy shall authorize an employee to work while impaired by the use of cannabis oil or to possess cannabis oil

during work hours, and the Company reserves all rights to impose discipline, up to and including the termination of employment, against any employee who possesses or is impaired by cannabis oil while working.

### Alcohol Use/Distribution/Possession/Impairment

All employees are prohibited from distributing, dispensing, possessing or using any beverage or medicine containing alcohol while at work or on duty and from coming onto company premises, reporting to work, or working with alcohol in their systems. Furthermore, lawful off-duty alcohol use, while generally not prohibited by this policy, must not interfere with an employee's job performance. HomeCentris will make an exception to this policy for company-sponsored celebrations and parties so long as any alcohol consumption does not impact the employees work responsibilities.

### Prescription and Over-the-Counter Drugs

This policy does not prohibit the possession and proper use of lawfully prescribed or over-the-counter drugs. However, employees should consult their doctor for information about the medication's effect on the ability to work safely, and promptly disclose any work restrictions to a supervisor or Human Resources. Employees are not required to reveal the medication name or the underlying medical condition. The Company reserves the right to transfer, reassign, place on leave or take other appropriate action during the time the employee uses medication that may affect his or her ability to perform safely. The Company will comply with all requirements pertaining to providing reasonable accommodations to the extent required by applicable law.

### Counseling and Rehabilitation

Employees who voluntarily seek help for substance abuse (self-referral) by contacting the Company will be provided an opportunity to pursue counseling and rehabilitation. An employee who is receiving counseling and/or treatment for substance abuse may use available vacation, sick leave, or, if eligible, family and medical leave. The employee cannot return to work until released by a treatment provider to do so, and when he or she receives a negative result on a return-to-work drug and/or alcohol test (as appropriate for that individual). In addition, the

employee may be asked to submit to follow-up testing for a period following the return to work.

## SMOKE FREE WORKPLACE POLICY

The Company prohibits smoking in the workplace and in company-owned vehicles occupied by more than one person. Please note, the “workplace” includes client’s homes. Employees wishing to smoke must do so outside during scheduled work breaks. This policy applies to both traditional tobacco products and electronic smoking devices.

Employees who violate this policy may be subject to disciplinary action up to and including termination of employment.

## Workplace Violence: No Tolerance

All employees, customers, contractors, vendors and business associates must be treated with courtesy and respect at all times. Employees are expected to refrain from conduct that may be dangerous to others.

Consequently, HomeCentris will not tolerate any acts of violence or threats of violence by an employee or former employee against any other employee in or about any HomeCentris’ premises or in a patient/client’s residence. In addition, threats or acts of violence against company property will also not be tolerated. Firearms and other dangerous weapons are strictly prohibited on HomeCentris premises or patient/client residences at all times.

In furtherance of this policy, employees must advise their supervisors or Human Resource designee of any suspicious workplace activity or situations or incidents they observe that may involve other employees, former employees, contractors, vendors, visitors or the public. Employee reports made pursuant to this policy will be held in confidence to the extent possible. HomeCentris will not tolerate any retaliation against any employee for making a report under this policy.

Anyone found to be responsible for threats of or actual violence or other conduct in violation of these guidelines will be subject to prompt disciplinary action up to and including termination.

## INFORMATION SECURITY

Confidentiality of our clients’ data and information security are vital to healthcare providers like HomeCentris. The first line of defense in data

security is the individual HomeCentris employee. HomeCentris employees are responsible for the security of all data that may come to them in any format. The responsibilities and requirements below are a summary of employee information security responsibilities. For the full policy, consult your Agency Director.

## Facility Access Control

ID Badge. To help maintain building security, all non-care employees should prominently wear an employee identification badge.

Challenge Unrecognized Personnel - All HomeCentris personnel are responsible to take positive action to provide physical security. If you see an unrecognized or un-badged person in a restricted HomeCentris office location, employees should challenge their right to be there. Any challenged person who does not respond appropriately should be immediately reported to supervisory staff.

## Workstation Use and Workstation Security

Unattended Computers - Employees shall not override HomeCentris 15-minute screen lock setting or any software application time out settings.

Home Use of HomeCentris Corporate Assets - Only software approved by HomeCentris, may be installed on HomeCentris equipment. Computers, laptops, and tablets supplied by HomeCentris shall be used solely for business purposes. Modifications or configuration changes are not permitted on computers supplied by HomeCentris for home use.

Personal software shall not be used on HomeCentris computers, laptops, or networks. If a need for specific software exists, ask your supervisor.

Retention of Ownership - All software programs, application data, and documentation generated or provided by employees, consultants, or contractors for the benefit of HomeCentris are the property of HomeCentris. This includes email.

Appropriate measures – Employees, contractors, volunteers, trainees, and other persons working for or with HomeCentris shall take “appropriate measures” when using workstations to ensure the confidentiality, integrity, and availability of sensitive information, including ePHI. Appropriate measures include:

- Restricting access to Workstations to only authorized personnel.

- Securing Workstations (screen lock or logout) prior to leaving area to prevent unauthorized access.
- Enabling a password-protected screen saver with a 15-minute timeout period to ensure unsecured Workstations will be protected.
- Complying with all applicable password policies and procedures.
- Ensuring Workstations are used for authorized purposes only.
- Never installing unauthorized software on Workstations.
- Storing sensitive information, including ePHI on network or web-based application servers, not on local hard drives.
- Keeping food and drink away from Workstations to avoid spills.
- Securing laptops that contain sensitive information by using cable locks or locking laptops up in drawers or cabinets.
- Complying with the Encryption policy.
- Complying with the Anti-Virus policy.
- Ensuring monitors are positioned away from public view. If necessary, install privacy screens or other barriers to public viewing.
- Ensuring Workstations are left on but logged off to facilitate after-hours updates. Exit running applications and close open documents.

## Prohibited Activities

HomeCentris employees and contractors are prohibited from the following activities and these activities shall be subject to the Sanctions Policy. The list is not inclusive. Other prohibited activities are referenced in the official policy.

- Crashing an information system.
- Attempting to hack an IT resource or to bypass a security feature.
- Attempting or introducing, computer viruses, Trojan horses, peer-to-peer ("P2P") or other malicious code into an IT system.
- Browsing. The willful, unauthorized access, or inspection of confidential or sensitive information to which you have not been approved on a "need to know" basis.
- Personal or Unauthorized Software. Use of personal software is prohibited. All software installed on HomeCentris computers must be approved by HomeCentris.
- Software Use. Violating or attempting to violate the terms of use or license agreement of any software product used by HomeCentris.

- System Use. Engaging in any activity for any purpose that is illegal or contrary to policies, procedures or business interests of HomeCentris.
- Password Sharing. Strictly prohibited.

## Personal Use of HomeCentris Workstations

HomeCentris resources, such as individual computer workstations or laptops, tablet computers, computer systems, networks, e-mail, and Internet software and services are intended for business purposes. However, incidental personal use is permissible if:

- 1) it is not more than a trivial amount of employee time or resources,
- 2) it does not interfere with staff productivity,
- 3) it does not preempt any business activity,
- 4) it does not cause any of the following:
  - a) Copyright violations
  - b) Illegal activities
  - c) Commercial use
  - d) Political Activities
  - e) Harassment
  - f) Sending Junk E-mail

## Electronic Communications, E-mail, text (SMS) Usage

HomeCentris encourages the business use of electronic communications. However, all electronic communication systems and messages generated on or handled by HomeCentris equipment including, but not limited to, telephones, e-mail, voice mail, text messages, instant messaging, cloud application communications, Internet, fax, personal computers, and servers are the property of HomeCentris.

Employees shall not use personal email accounts for sending work-related email. Employees shall only use HomeCentris installed email systems for sending company email.

Generally, while it is **NOT** the policy of HomeCentris to monitor the content of any electronic communication, HomeCentris is responsible for servicing and protecting its equipment, networks, data, and resource availability and therefore may be required to monitor electronic communications from time to time. HomeCentris reserves the right, at its discretion, to review any employee's files or electronic communications to the extent necessary to ensure all electronic media

and services are used in compliance with all applicable laws and regulations as well as HomeCentris policies.

Users should be professional when composing emails and understand their content impacts HomeCentris' reputation. Employees should structure all electronic communication with knowledge the content could be monitored, forwarded, printed, or stored by others.

## De-identification of Personal Health Information (PHI)

As directed by HIPAA, all personal identifying information must be removed from all data that falls within the definition of PHI before it is exchanged. Therefore, any electronic communications must remove the below PHI before transmitting. Exception: The below PHI may be included in an electronic communication if sent via the HomeCentris encrypted email platform, or fax.

De-identification is defined as the removal of any information that may be used to identify an individual or of relatives, employers, or household members. PHI includes:

- Names
- Addresses
- Geographic subdivisions smaller than a state
- All elements of dates directly related to the individual (Dates of birth, marriage, death, etc.)
- Telephone numbers
- Facsimile numbers
- Driver's license numbers
- Electronic mail addresses
- Social security numbers
- Medical record numbers
- Health plan beneficiary numbers
- Account numbers, certificate/license numbers
- Vehicle identifiers and serial numbers
- Device identifiers and serial numbers
- Web Universal Resource Locators (URLs)
- Internet Protocol (IP) address numbers
- Biometric identifiers
- Full face photographic images and any comparable images

## Encryption USE on the e-mail system

To be truly HIPAA and HITECH compliant, HomeCentris staff must follow the procedures below when electronically sending client/patient info.

- Employees shall never text PHI under any circumstances. Texting is not a secure way to transmit PHI.
- All internal email sent between HomeCentris users is considered secure and does not require encryption. However, never place patient identifying information in the “subject” line.
- When transmitting data to parties outside HomeCentris via email, employees, volunteers, and anyone else with a HomeCentris email account shall encrypt any emails containing ePHI. To do this, type the word [encrypt], including the brackets, in the email subject line. The email server will automatically encrypt the message.

## Internet Access

Internet access is provided for HomeCentris users and is considered a great resource. This resource is costly to operate and must be allocated primarily to business needs. Internet access provided by HomeCentris should not be used for entertainment, listening to music, viewing the sports highlights, games, movies, etc. Do not use the Internet as a radio or to monitor the weather or stock market results.

Individual Internet usage is monitored. If an employee is spending excessive time or consuming excessive bandwidth for personal use, disciplinary action will be taken. Any employee visiting pornographic sites will be terminated.

## Reporting Security Incidents

Users are responsible for the day-to-day, hands-on security of their software applications. Employees should immediately report perceived security incidents to the appropriate supervisor or security person.

You may contact the Security Officer at 410-486-5330 or [security@homecentris.com](mailto:security@homecentris.com).

1. Provide the Security Officer with as much detail as possible.
2. Be responsive to information requests from the Security Officer.
3. Be aware that the Security Officer has an obligation to follow up on any reasonable belief that PHI has been compromised.

The Security Officer, in conjunction with legal counsel, will decide whether to notify the CEO as appropriate by taking into consideration the seriousness and scope of the breach.

Security breaches shall be promptly analyzed and investigated. If criminal action is suspected, the Security Officer shall contact the appropriate law enforcement and investigative authorities immediately, which may include but is not limited to the police or the FBI.

## Transfer of Sensitive/Confidential Information

When confidential or sensitive information from one individual is given while conducting official business, the receiving individual must maintain the confidentiality or sensitivity of the information. HomeCentris maintains sensitive information and employees must hold all data in the strictest confidence. Any purposeful release of sensitive data is a violation of HomeCentris policy and will result in personnel action, and may result in legal action.

## Transferring Software and Files between Home and Work

HomeCentris' network has a wide range of security protections in place. Since HomeCentris does not control non-HomeCentris computers, HomeCentris cannot be sure of the methods in place to protect HomeCentris sensitive information, hence the need for this restriction.

If HomeCentris has procured a web-based or cloud software application, authorized users may access this software at home. However, all HomeCentris data must remain in the cloud on the application software and cannot, under any circumstances, be downloaded, saved, printed, or otherwise transferred to a home computer, tablet, smart phone or portable storage devices unless the employee has written authorization by the Security Officer and the home device has been encrypted by HomeCentris IT personnel.

The use of zip drives, flash drives, thumb drives, or other portable storage devices for saving any HomeCentris proprietary data, including patient information, IT Systems information, financial information, or customer lists, marketing materials, and human resource data is severely restricted. To use such a drive, you must sign out an encrypted drive from the Security Officer.

## Sanctions for Violations

All HomeCentris workforce members must protect the confidentiality, integrity, and availability of sensitive information at all times. HomeCentris will impose disciplinary action and sanctions, as described in the Sanctions policy, on any individual who accesses, uses, or discloses sensitive information without proper authorization.

## No Solicitation or Distribution of Literature

HomeCentris has established the following rules applicable to all employees and nonemployees that govern solicitation, distribution of written material and access to Company property:

- Employees may engage in personal solicitation activities only during nonworking times. No employee may engage in solicitation during his or her working time or during the working time of the employee or the employees at whom such activity is directed;
- Employees may distribute or circulate any written or printed material only in non-work areas, during nonworking times. No employee may distribute or circulate any written or printed material in work areas at any time, or during his or her working time or during the working time of the employee or employees at whom such activity is directed;
- Nonemployees are not permitted to solicit or to distribute written material for any purpose on Company property; and
- Off-duty employees are not permitted in work areas.
- Solicitation of patients is not allowed under any circumstances.

The Company's electronic resources must never be used for solicitation.

As used in this policy, "working time" includes all time for which an employee is paid and/or is scheduled to be performing services for the Company; it does not include break periods, meal periods, or periods in which an employee is not performing and is not scheduled to be performing services or work for the Company.

# COMPLIANCE, FRAUD, AND ABUSE CONCERNS

We believe hospitals, physicians, and referral sources will refer their patients to HomeCentris because of the quality of our services, location, technological sophistication, and the excellence of our employees.

## No Payment for Patient Referrals

Every agreement with a clinician or other referral source shall be in writing and approved by the Company to ensure compliance with applicable laws, regulations, agreements with lenders and policies.

You may not solicit, nor receive, nor offer to pay in any form, physicians, health care professionals, or other referral sources for referrals of patients. Kickbacks, bribes, rebates, or flow of any kind of benefits intended to induce referrals are strictly prohibited. Employees will not offer or give inducements to anyone for a decision or action that is favorable to HomeCentris. We will not give anything of value to anyone under circumstances that could create even an appearance that HomeCentris is seeking preferential treatment or is paying a reward for referrals. An improper reward includes anything of value, not just money.

Contract payments or other benefits provided to clinicians and referral sources must be for the contracted services and rates. Every payment must be supported by proper documentation of the services provided.

## Arrangements with Physicians or Other Healthcare Professionals:

To ensure all financial arrangements between HomeCentris and physicians (or their immediate family members) comply with federal and applicable state law governing prohibitions on physician self-referrals, all arrangements involving physicians who may refer patients for any of the following services (which may vary by state) must be reviewed and approved by the Compliance Officer:

- clinical laboratory services;
- physical therapy services;
- occupational therapy services;
- speech-language pathology services;
- radiology services, including positron emission tomography scans, nuclear imaging, magnetic resonance imaging, computerized axial tomography scans, and ultrasound services;
- radiation therapy services and supplies;
- durable medical equipment and supplies;

- parenteral and enteral nutrients, equipment, and supplies;
- prosthetics, orthotics, and prosthetic devices and supplies;
- home health services;
- outpatient prescription drugs; and
- inpatient and outpatient hospital services.

### Billing:

- We will not tolerate the submission of any claim or request for reimbursement or payment that is false, fictitious or inaccurate and we will only bill payors for those patients who meet all applicable requirements for the Company's services.
- We will submit claims for payment or reimbursement using only appropriate billing codes.
- We will submit claims only for services actually rendered which have been appropriately documented in the medical record. The Company will not tolerate the submission of any data or document relating to a false, fictitious, or inaccurate claim or request for reimbursement.
- Caregivers who submit time records for times when they were not physically with their client will be considered in violation of this policy and will be subject to disciplinary action and reporting to the appropriate state and federal authorities.
- If inaccuracies are discovered in claims already submitted for payment or reimbursement the payor shall be immediately notified and appropriate actions taken to remedy the matter.

### Reporting Compliance Concerns

We believe the Compliance Program can be effective only if there is active participation by all the Company employees and that mandatory reporting, thorough investigation, and uniform and fair remedial action is a necessary component of an effective program.

Employees with knowledge of an actual or potential violation of law, regulation, policy, procedure, and/or the Company Standards of Conduct, or who has questions on these matters, should report the matter to a supervisor. If the matter is not resolved in a timely manner or to an employee's satisfaction, employees are encouraged to contact the Company's Compliance Officer.

- The Compliance Hotline number is 888-739-0965.
- The Compliance Email Box is [compliance@homecentris.com](mailto:compliance@homecentris.com).

When reporting, please provide as much detail as possible, including, but not limited to, names dates, times, location, and the specific conduct you feel may violate the law or the Company policy. Unless urgent, questions should be asked in writing. Please try to provide copies of all relevant documents, if applicable.

The Company will not retaliate against any employee making a good faith report of a suspected violation. However, any employee who knowingly makes false allegations may be subject to disciplinary action in accordance with Company policy.

## Employee HIPPA Compliance & Privacy Policy

HomeCentris is committed to compliance with all Federal and/or State guidelines regarding HIPAA as amended. HomeCentris will protect Personal Health Information (PHI). HomeCentris will comply with the standards and other requirements of the regulations.

### HIPAA Compliance and Privacy Complaints

For complaints about our handling of your PHI, you may:

1. Call the HomeCentris Compliance Hotline at 888-739-0965.
2. Contact the government:  
Secretary of the U.S. Department of Health and Human Services  
200 Independence Avenue  
Washington, D.C. 20201

## Conflicts of Interest

Employment with the Company involves a relationship of trust and loyalty and employees must be free from any influence that might interfere with the proper and efficient discharge of their duties or be inconsistent with their obligations of loyalty to the Company. For additional information, please discuss with your supervisor or HR.

## SEPARATION FROM EMPLOYMENT

The primary categories HomeCentris uses for terminating employees are voluntary and involuntary.

### Voluntary (or Resignation)

HomeCentris requests a letter of resignation from an employee who voluntarily terminates employment. It is customary for management or

supervisory personnel to give at least thirty (30) days' notice and non-management/non-supervisory staff to give a two (2) week notice.

HomeCentris also considers employees who fail to report for work without any notification to their supervisor and whose absence continues for a period of three consecutive shifts (no call / no show), extended absence without proper notification, and failure to return to work after the conclusion of leave of absence, vacation, personal days, etc. as a voluntary form of termination. If you do not provide advance notice or fail to actually work the remaining notice period, you will not be eligible for rehire and will not receive accrued PTO benefits.

### Involuntary

Involuntary termination occurs if HomeCentris initiates an employee's termination. This can occur without notice, for any or no reason.

### Exit Interview

Prior to an employee's departure, an exit interview may be scheduled to discuss the reasons for resignation and the impact on benefits. Departing employees should complete any forms necessary for the transfer or termination of benefit programs. All employees are required to return computers, cell phones, tools, manuals, training manuals, customer and pricing lists, files, keys, uniforms, sales office vehicles, supplies, or any other Company property. Any unauthorized retention of any Company resources or property may be regarded as theft and may prompt various civil and/or criminal legal actions.

### Termination of Benefits

You are eligible to receive benefits if you follow the above procedures.

**Paid Time off (PTO) Leave:** Accrued PTO leave will generally be paid in the last paycheck and in accordance with the Paid Time off Policy, unless ineligible due to reasons stated above.

**Health Insurance:** Health insurance terminates at midnight of the last day of the month of the employee's employment separation. Information for Consolidated Omnibus Budget Reconciliation ("COBRA") continued health coverage will be provided according to required federal guidelines.

## Severance

It is not standard practice for HomeCentris to offer severance pay if you have either voluntarily terminated your employment, retired, or were terminated by HomeCentris.

## Employee Handbook Acknowledgment and Receipt

I acknowledge that I have received and read a copy of the HomeCentris' Employee Handbook. I understand that the Handbook sets forth the terms and conditions of my employment with the Company as well as the duties, responsibilities and obligations of employment with the Company. I understand that HomeCentris has provided me various alternative channels to raise concerns of violations of this handbook and company policies and encourages me to do so promptly so that HomeCentris may effectively address such situations, and I understand that nothing herein interferes with any right to report concerns, make lawful disclosures, to engage in collective activities relating to wages, hours or working conditions, or communicate with any governmental authority regarding potential violations of laws or regulations. I agree to abide by and be bound by the rules, policies and standards set forth in the Employee Handbook.

I acknowledge that my employment with HomeCentris is at-will, meaning that it is not for a specified period of time and that the employment relationship may be terminated at any time for any reason, with or without cause or notice, by me or the Company. I further acknowledge that only, the CEO or his or her authorized representative has the authority to enter into an agreement that alters the at-will relationship. Any such agreement must be in writing and signed by the CEO or his or her authorized representative.

I further acknowledge that HomeCentris reserves the right to revise, delete and add to the provisions of the employee handbook, but that all such revisions, deletions or additions must be in writing. No oral statements or representations can change the provisions of the handbook or supplement. Furthermore, the Company's policy of at-will employment can only be changed as stated in the prior paragraph.

I further acknowledge that I have had the opportunity to ask any questions or have any portions of the policies clarified or additional details provided.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_