



Our Care Matters



CODE OF CONDUCT

AS OF 6/19/2019

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OUR MISSION

Home Health

To keep our patients and families first, realizing that we can make a difference in their lives by providing clinical excellence, extraordinary service and compassionate care.

Hospice

To honor life and offer compassion to individuals and their families when facing a life-limiting illness.



Dear Valued Colleague or Partner:

We know that you have a choice about where and how you direct your talents and abilities. We want to thank you for choosing Kindred at Home. The care you provide each day makes a huge difference in the lives of our patients. Integrity is at the heart of our values, and you are vital to maintaining our culture of integrity. Our success is built on a foundation of doing what's right for our patients and family members, and we are best able to provide quality care to our patients when we operate with integrity. Kindred at Home's Code of Conduct ("Code") is designed to promote our commitment to integrity and provide you with guidelines to do your job in an ethical manner—we are committed to Doing What's Right.

Please take a few moments to read and understand the contents of our Code. It is applicable to all aspects of our business and is an essential part of our commitment to quality and customer service.

Another part of that commitment is to make sure that every employee has the ability to express any concerns or complaints without fear of reprisal or any other penalty. We do this in multiple ways. Our Open Door Policy encourages employees to contact their immediate supervisor and, if necessary, to proceed up the chain of command to resolve problems and concerns. If this option is inappropriate or ineffective, you may also call our confidential Compliance Helpline at 800.359.7412 or email KAHcompliance@kindred.com.

Always ask questions when you are unsure of the right thing to do, and speak up about any activity by anyone that compromises our commitment to integrity. There will be no retaliation or retribution against any employee who reports their compliance concerns in good faith.

Thank you for playing an important part in furthering our commitment to Doing What's Right.

Best regards,



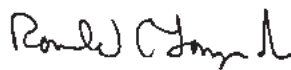
John Arlotta
Board Chairperson



David Causby
President and CEO



Selece Beasley
Chief Compliance Officer



Ron Lazas
Chief General Counsel

COMMITMENT TO INTEGRITY & DOING WHAT'S RIGHT

Kindred at Home is committed to providing high-quality patient care and outstanding customer service in order to be the most trusted and respected provider of home health, hospice, and community care services in every community we serve. We are also committed to full compliance with all federal and state healthcare program requirements. To achieve this goal, we are driven by a commitment to our mission:

HOME HEALTH

To keep our patients and families first, realizing that we can make a difference in their lives by providing clinical excellence, extraordinary service and compassionate care.

HOSPICE

To honor life and offer compassion to individuals and their families when facing a life-limiting illness

We must make every effort to address any concern of non-compliance. The Code supports these efforts by promoting ethical and lawful behavior as well as transparency across all aspects of the organization. It is never acceptable for any Kindred at Home officer, employee or contractor to ask or to be asked to act in any manner that is not in accordance with these standards of behavior or conduct. We depend on you to help us uphold our commitment to integrity. Do your part to understand the requirements of this Code and the policies of Kindred at Home that apply to your job and comply with these requirements at all times in Doing What's Right.

If you have a question or concern about any potential compliance matter, we have an Open Door Policy, which allows you to approach any supervisor, manager, director or member of the Compliance or Legal Departments to be sure that decisions made and actions taken reflect Kindred at Home's values and commitment to Doing What's Right. You may also call our Compliance Helpline at 800.359.7412 or email KAHcompliance@kindred.com. Anyone in our

organization who receives a concern or question regarding compliance has the responsibility to find the answer. Retaliation, retribution, intimidation or harassment of anyone who makes a good faith report regarding a possible concern is strictly prohibited by Kindred at Home.

Kindred at Home's Code describes our values, standards and expectations so that everyone has a clear understanding of our commitment to integrity, expectations for acting with integrity inside and outside the workplace, tools for reporting questions and concerns regarding integrity matters, and available resources to learn more about how to act with integrity.

Who Is Covered?

All Kindred at Home employees, officers, board members, contractors, vendors and others who do business with Kindred at Home are required to comply with our Code, policies and procedures. You must also comply with all applicable laws and regulations, including all federal healthcare program requirements. Contractors and other third parties that work with Kindred at Home are encouraged to have their own compliance programs and are also expected to comply with the standards of our Code.



KINDRED AT HOME'S COMPLIANCE PROGRAM

Structure

Kindred at Home's Compliance Program is a comprehensive effort to promote ethical and legal behavior that is in compliance with standards of performance. While detecting and preventing fraud, waste, abuse and policy violations are key components of our Compliance Program, we also provide resources to help guide your conduct and answer your questions.

To promote compliance with laws, regulations and policies, Kindred at Home has established systems, processes and compliance committees at every level of the organization. The Compliance Program is administered by the Compliance Department and headed by the Chief Compliance Officer. The Compliance Department operates independently from Kindred at Home's other departments and operating divisions, and the Chief Compliance Officer reports directly to the Kindred at Home CEO and Board of Directors. The Compliance Department's mission is to be a trusted partner in fostering integrity, transparency, accountability and a culture of compliance that protects the reputation, mission, and values of Kindred at Home.

Our Compliance Program is made up of the following components:

- Code of Conduct
- Performance Improvement
- Oversight
- Reporting Mechanisms
- Training and Education
- Internal Response
- Monitoring and Auditing
- Corrective Action

For additional information and guidance on the Compliance Program, please see the following Kindred at Home policy: ECP 1.0 Compliance Program.

Policies and Procedures

Kindred at Home's policies and procedures (referenced throughout this Code),² along with this Code, provide guidance on how to perform your job responsibilities ethically and legally. You must be aware of and follow the policies and procedures that apply to your role with Kindred at Home.

Compliance Investigations

Kindred at Home is committed to full compliance with all applicable laws, rules, regulations, standards and policies. Kindred at Home's Compliance Department is responsible for ensuring all suspected or potential violations are investigated in a timely, consistent and objective manner.

For additional information and guidance on the procedures used to report and investigate compliance concerns, please see the following Kindred at Home policy: ECP 8.0 Compliance Helpline and Investigations (Disclosure Program). Your Obligation to Report

Addressing your questions and reporting your concerns are crucial to the effectiveness of Kindred at Home's Compliance Program. In *Doing What's Right*, you are required to report to Kindred at Home any activities you suspect:

- Are harmful to a patient, resident, family member or staff member.
- Are illegal or unethical.
- Violate any state or federal healthcare program requirements.
- Violate the Code, employee handbook, or any other policy or procedure of Kindred at Home.

It is not acceptable to overlook actual or potential wrongdoing. You have a duty to report to Kindred at Home all concerns that come to your attention regardless of source. This includes concerns raised by patients in your care.

What should I do if I feel that the practices in my location or department violate the Code?

You should report the concern to your supervisor using our Open Door Policy. If you are not comfortable with reporting that concern to him or her, you may raise the concern to another supervisor or manager up the chain of command. In any event, you should also feel free to report any concern to the Compliance or Legal Departments or via the Compliance Helpline.

We are committed to investigating all reported compliance concerns. An investigation may reveal that there is a need for corrective action, education, clarification and/or discipline. The investigation may also reveal that other individuals had similar concerns and there is a need to address the matter facility/department-wide. We appreciate your willingness to uphold our commitment to integrity by allowing us to address questions and concerns and implement appropriate corrective action when necessary.

For additional information and guidance on your reporting obligations and Kindred at Home's Open Door Policy, please see the following Kindred at Home policy: ECP 8.o Compliance Helpline and Investigations (Disclosure Program).

Protection from Retaliation

Open communication of concerns regarding compliance or business ethics is important to the success of Kindred at Home's Compliance Program. Retaliation, retribution, intimidation or harassment of anyone who makes a good faith report regarding a possible concern will not be tolerated. Any supervisor, manager or employee who conducts or condones retribution, retaliation or harassment in any way will be subject to disciplinary action up to and including termination of employment.

What should I do if I feel retaliated against?

Kindred at Home will not tolerate retaliation in any form. If you experience retaliation, you should report it immediately to a supervisor through our Open Door Policy, to the Compliance or Legal Departments or to the Compliance Hotline so it may be addressed appropriately.

For additional information and guidance regarding Kindred at Home's prohibition against retaliation, please see the following Kindred at Home policy: ECP 8.o Compliance Helpline and Investigations (Disclosure Program).

How to Report a Concern

Concerns, complaints and potential violations of the Code or other Kindred at Home policies may be reported in various ways:

By mail, sent to:

3350 Riverwood Parkway, Suite 1400
Atlanta, Georgia 30339
Attn.: Chief Compliance Officer

By emailing KAHcompliance@kindred.com

By calling the Compliance Helpline at 800.359.7412

By visiting www.mycompliancereport.com

By reporting the concern using our Open Door Policy, which allows you to approach a supervisor, manager, director or member of the Compliance or Legal Departments

Kindred at Home's Compliance Helpline is available 24 hours a day, 365 days a year. An external vendor operates the Helpline, and calls are not recorded.

Regardless of how you report a concern, you may remain anonymous if you wish. To the extent possible, Kindred at Home will maintain the confidentiality and anonymity of your reported concern.

All concerns reported to the Compliance Helpline are taken seriously and will be addressed to the fullest extent necessary.

Therefore, it is important to use the Helpline appropriately and in good faith. For additional information and guidance on the various methods available to report a compliance question or concern, please see the following Kindred at Home policy: ECP 8.0 Compliance Helpline and Investigations (Disclosure Program).

How a Concern Is Addressed

When appropriate, you may be contacted by someone either during or at the conclusion of the investigation. In order to protect the rights of involved parties, you will not be told if any disciplinary action resulted. However, you may witness changes, corrections or education taking place within the facility or location as a result of a reported issue.

For additional information and guidance on how compliance concerns are addressed, please see the following Kindred at Home policies: ECP 8.0 Compliance Helpline and Investigations (Disclosure Program), ECP 7.0 External Monitoring and ECP 10.0 Internal Monitoring.

Your Obligation to Cooperate

For internal investigations, all employees are required to cooperate. Kindred at Home prohibits destroying or altering any documents (whether written or electronic) associated with an investigation. Kindred at Home prohibits lying to or misleading an investigator or obstructing an investigation by hindering collection of evidence.

For external investigations, our policy is to comply with all reasonable and lawful requests for information and documents made by government officials.

You must notify the Compliance Department or the Legal Department immediately if a government agency or other third party is asking you for information regarding a suspected violation of law or if you learn that an agency is conducting an investigation of Kindred at Home.

For additional guidance on your obligation to cooperate with internal investigations and investigations conducted by third parties, please see the following Kindred at Home policies: ECP 7.0 External Monitoring, ECP 10.0 Internal Monitoring and ECP 8.0 Compliance Hotline and Investigations (Disclosure Program).

Consequences of Not Complying with Our Commitment to Integrity

Failure to comply with our commitment to integrity can lead to serious consequences for you, your coworkers and for Kindred at Home, including termination of employment; loss or suspension of licensure; lawsuits, government investigations and prosecutions; prison, fines and exclusion from participating in state and federal healthcare programs; and loss of respect and reputation.

As a result, Kindred at Home will take disciplinary action, up to and including termination of employment, for the following acts that compromise our commitment to integrity:

- Participating in or authorizing any violation of laws, regulations, the Code or other Kindred at Home policies and procedures.
- Failing to report violations.
- Concealing violations.
- Refusing to cooperate with an internal investigation.
- Threatening or retaliating against a coworker who reports a violation.

For additional information and guidance relating to violations of Kindred at Home's commitment to integrity, please see the following Kindred at Home policy: ECP 6.0 Enforcement and Discipline of Compliance Matters.

Commitment to Education and Training

Kindred at Home recognizes that education and training are critical to establishing and maintaining an ethical culture of integrity. Kindred at Home has established training programs

to provide detailed guidance on compliance issues and to ensure that each Kindred at Home employee or contractor receives the information needed to perform his or her job functions according to our mission and commitment to Doing What's Right.

As an employee, you will receive education about the Compliance Program within 30 days of hire and annually thereafter through general compliance training. You are also expected to participate in job-specific (role-based) training requirements that provide education on state and federal law, regulations and requirements based on your specific line of business or role.

Role-Based Training Programs focus on:

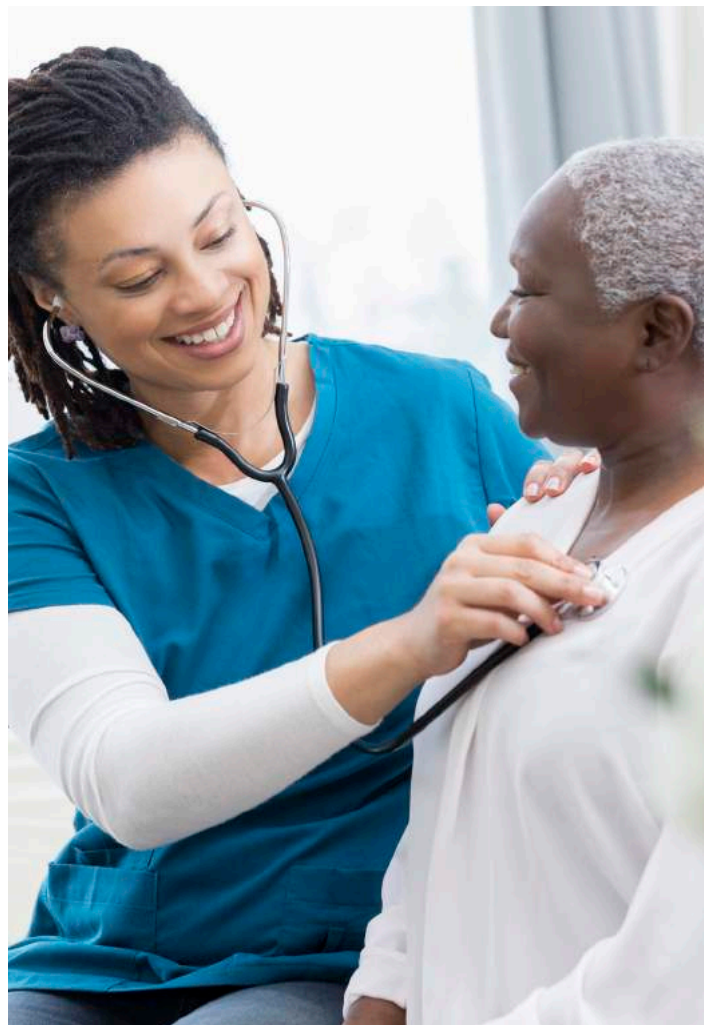
- Fraud, waste and abuse.
- Ethics and appropriate billing and coding practices.
- Documentation guidelines to support the requirements of participation in Medicare and Medicaid programs.
- Privacy and security of protected health information and other confidential information.
- Patient/resident rights.
- Interdisciplinary team process and care planning.
- Anti-kickback Statute, Stark Law and gifts.

Kindred at Home monitors training requirements in the Learning Management System ("LMS"). The LMS is available on our Knect intranet site, and employees may log in to view their own specific required training, training in progress, completed training, a training catalog and license certification history.

For additional information and guidance regarding compliance training, please see the following Kindred at Home policies: ECP 2.0 Covered Person and Covered Contractor Training Requirements and ECP 4.0 Compliance Training.

KEY TAKEAWAYS

- Kindred at Home is committed to integrity and Doing What's Right.
- You are also expected to be committed to integrity and Doing What's Right, which includes complying with the code and all applicable laws, regulations, policies and procedures.
- You are required to report any compliance concerns to Kindred at Home, and you will be protected from any retaliation for doing so.
- Our Open Door Policy and Compliance Hotline make it easy for you to ask questions and report any concerns.



PROTECTING PATIENT INFORMATION

All Kindred at Home employees and contractors are required under federal and state laws, such as the Health Insurance Portability and Accountability Act (“HIPAA”) and the Health Information Technology for Economic and Clinical Health (“HITECH”) Act, to maintain the privacy and security of the protected health information (“PHI”) of our patients. All individually identifiable information, including names, social security numbers, diagnoses, treatment information and other information related to patients and residents, constitutes PHI regardless of whether the information is verbal, written or electronic.

To ensure information security, Kindred at Home has implemented certain safeguards, including:

- Encrypting mobile devices containing PHI.
- Requiring passwords for Kindred at Home systems.
- Limiting access to information to the minimum necessary based on job role.
- Prohibiting unauthorized software on Kindred at Home devices.
- Prohibiting texting PHI.

You should never:

- Take copies of medical records out of the work place without permission.
- Leave PHI unattended and in plain view (including in your vehicle).
- Post PHI on social media without patient or resident authorization.
- Store PHI on any personal device
- Send PHI to a personal email account

For additional guidance on the protection of patient information, please see the following Kindred at Home policy: ECP 16.0 Privacy and Security of Health and Personal Information.

Breaches of Protected Health Information

Any unauthorized acquisition, access, use or disclosure of PHI that compromises the security or privacy of the PHI is a potential breach that must be appropriately addressed.

If you become aware of a breach or potential breach of any PHI, you should immediately report your concern through our Open Door Policy, to the Compliance or Legal Departments or to the Compliance Helpline. You are expected to cooperate with an investigation of the breach or potential breach. Kindred at Home may be subject to fines and penalties for failing to respond timely and properly to breaches. The Compliance Department will ensure that all federal and state notification requirements are followed.

Examples of potential breaches may include:

- Misdirected faxes containing PHI.
- Lost or misdirected medical records.
- Theft of medical records from a vehicle.
- Discussing a patient’s or resident’s medical condition with a person not authorized to receive the information.
- Allowing unauthorized people to sit in on interdisciplinary team meetings.
- Posting pictures of patients, residents or their information on social media.
- Sending emails to people who are not authorized to receive the information, such as by using the “reply all” feature.

What if I accidentally send a fax or email containing PHI to the wrong number or address?

Any instance of misdirected PHI should be acted upon immediately. If a fax or an email was sent to an unintended recipient, contact the recipient by phone, fax or email to explain that the information was misdirected. Ask the individual to shred or otherwise destroy all documents received. Also ask the unintended recipient for confirmation in writing or email that the destruction occurred. You should also report the incident to Kindred at Home through the

Open Door Policy, to the Compliance or Legal Departments or via the Compliance Helpline. You should provide details of the error (subject matter, date, time, fax number used in error, etc.) and then follow steps in the Kindred at Home policy regarding potential breaches of PHI.

When reporting the potential breach, you should be prepared to provide detailed information about what was contained in the fax or email so that an appropriate review can be completed. For additional guidance on responding to a potential or actual breach, please see the following Kindred at Home policy: PSP 42 Responding to a Privacy or Security Incident.

KEY TAKEAWAYS

- You are required to maintain the privacy and security of protected health information.
- You must immediately report any actual or potential breach of protected health information.



OUR LEGAL RESPONSIBILITIES

What are fraud, waste and abuse, and how can I identify them in my work environment?

FRAUD is a false statement made or submitted by an individual or entity that knows the statement is false, and knows that the false statement could result in some otherwise unauthorized benefit to the individual or entity. These false statements could be verbal or written.

WASTE generally means overuse of services or other practices that result in unnecessary costs.

ABUSE generally refers to provider, contractor or member practices that are inconsistent with sound business, financial or medical practices, and that cause unnecessary costs to the healthcare system.

Preventing Fraud, Waste and Abuse

In Doing What's Right, Kindred at Home is committed to detecting and preventing fraud, waste and abuse. We have developed and implemented policies and procedures to ensure compliance with the laws that govern our operations as a healthcare provider. In addition to written policies and procedures, Kindred at Home provides regular education to officers, employees, agents and contractors on combating fraud, waste and abuse through general and role-based compliance training.

For additional information and guidance on Kindred at Home's commitment to preventing fraud, waste and abuse, please see the following Kindred at Home policy: ECP 15.0 Fraud, Waste and Abuse False Claims Whistleblower Policy.

Accurate Records and Billing

Our financial and other business records shape the business decisions we make. You are responsible for ensuring that Kindred at Home's books and records are full, fair, accurate, timely and understandable reflections of Kindred at Home's operations and business activities.

Kindred at Home has implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers and patients that conform to pertinent federal and state laws and regulations.

We prohibit any employee or agent of Kindred at Home from knowingly presenting, or causing to be presented, claims for payment or approval that are false, fictitious or fraudulent. All billing and patient records must provide reliable documentation of the services we render. It is important that all individuals who contribute to medical records provide accurate information and do not destroy any information considered part of the official medical record. Officers, employees and agents are expected to cooperate fully with all internal and external audits of claims and billing systems.

If you have reason to believe that anyone is engaging in false or fraudulent business practices or false or improper billing practices, you are required to immediately report that concern through the Open Door Policy, to the Compliance or Legal Departments or to the Compliance Helpline.

The following are examples of prohibited billing practices:

- Misuse of resident/patient trust funds.
- Fraudulent or false accounting/record keeping.
- Unauthorized payments of money to any organization or person, including payments or wages not earned.
- Billing for services not provided.
- Billing for medically unnecessary services.
- Fraudulently changing procedure or diagnosis codes.
- Billing for services by unlicensed or excluded individuals.
- Improper or inaccurate Minimum Data Set ("MDS") Assessment or other assessments used to determine payment amounts.

For additional guidance regarding Kindred at Home's billing and record requirements, please see the Kindred at Home billing policies for each service line.

False Claims Act

The False Claims Act applies to Medicare and Medicaid program reimbursement and prohibits, among other things, billing for services not rendered, billing for undocumented services, falsifying cost reports, billing for medically unnecessary services, assigning improper codes to secure reimbursement or higher reimbursement, participating in kickbacks, and retaining an overpayment for services or items.

Violating the False Claims Act may result in civil, criminal and administrative penalties, including monetary penalties, imprisonment, exclusion from participation in federal healthcare programs and loss of licensure.

In its commitment to Doing What's Right, Kindred at Home prohibits retaliating or discriminating against employees, agents or contractors because of their initiation of, or participation in, a lawful false claims investigation, report, claim or proceeding.

For additional guidance on the False Claims Act, please see the following Kindred at Home policy: Compliance Policy 15.0.

Kickbacks, Referrals and Bribes

Under the Anti-Kickback Statute, it is a crime to knowingly and willfully offer, pay, solicit or receive anything of value (called "remuneration") to induce or reward referrals of any item or service paid under federal healthcare programs, including Medicare and Medicaid. Things of value can take many forms and include kickbacks, bribes and rebates made either directly or indirectly. Even if there are legitimate business reasons for the remuneration, if one of the reasons you give or receive remuneration is prohibited, there may be a violation of the Anti-Kickback Statute.

To ensure compliance with the Anti-Kickback Statute, Kindred at Home prohibits accepting or offering anything of value in exchange for the direct or indirect referral of patients or residents, or in exchange for purchasing, leasing or ordering any goods or services.

Prohibited kickbacks, referrals and bribes may include, but are not limited to:

- Making payments to or receiving payments from referral sources that exceed fair market value.
- Providing to, or accepting from, referral sources any free or discounted goods or services.
- Establishing payment arrangements with vendors, suppliers or referral sources where reimbursement is based on the volume of business rather than the value of the services provided.
- Making payments or providing courtesies in exchange for referrals.

The Physician Self-Referral Law, or Stark Law, prohibits physicians from making Medicare and Medicaid referrals to a provider for designated health services when the physician or an immediate family member of the physician has a financial relationship with the provider. A financial relationship can mean ownership, investment or compensation. In addition, Kindred at Home is prohibited from submitting claims for services provided resulting from a prohibited referral. Unlike the Anti-Kickback Statute, the Stark Law can be violated even if you do not have the intent to do so.

The consequences for failing to comply with these laws can be severe and can include imprisonment, significant financial penalties and exclusion from Medicare and Medicaid.

Keep in mind that even if a service is not being paid under a federal healthcare program, there may be similar state and federal laws that apply to private payors, patients and residents. You should contact the Legal Department if you have questions.

What if I am unsure about whether an arrangement with a contractor or physician is appropriate or legal?

If you have any question or concern regarding an arrangement, you should report the question through the Open Door Policy, to the Compliance or Legal Departments or via the Compliance Helpline.

Gifts and Gratuities

Kindred at Home prohibits its employees from giving or receiving (or offering to give or receive) any gift, gratuity or business courtesy to or from a vendor, contractor or potential business affiliate if the gift's value is more than nominal and is (or could be seen as) intended to influence business opportunities awarded to the vendor or contractor.

Additionally, cash, gift cards or other cash equivalents are strictly prohibited regardless of the amount or purpose of the gift.

Non-monetary gifts of nominal value, such as mugs, pens and calendars, may be given as a token of appreciation for a business relationship; however, these gifts should not be given routinely. Gifts to physicians must be logged on a physician gift log and cannot exceed the annual statutory limit for physician gifts.

Kindred at Home allows employees to attend social events with business partners in order to develop professional relationships or to discuss the services that Kindred at Home provides. Attendance is acceptable as long as the event is reasonable and customary (such as a meal) and business is discussed. Attendance at the event must not be in exchange for referrals or be a solicitation of business, and attendance at such events must be infrequent. Contact the Compliance or Legal Departments with any questions.

A vendor that I do business with offered me tickets to a professional football game. I don't plan on using them but wanted to give them to my brother. Is this okay?

No, you may not accept the gift. Although Kindred at Home encourages establishing positive relationships with our business associates, accepting a gift in excess of nominal value, even if you do not plan to use it yourself, is strictly

prohibited. Accepting such a gift, whether intended to do so or not, may create the appearance that Kindred at Home will be influenced to do business or continue to do business with that particular vendor. You should thank the vendor and politely decline the offer. Offers of gifts that may exceed nominal value must be disclosed to operations.

An employee, as part of their marketing process, drops off food to a case management office every quarter. Is this an acceptable practice?

No, this is not acceptable. Kindred at Home encourages positive relationships with business partners, but a case manager is in a position to induce referrals. Further, no employee of Kindred at Home may solicit or obtain any improper personal benefit by virtue of his or her work or employment with Kindred at Home.

Gifts and Loans from Patients, Residents and Families

At Kindred at Home, we help patients and families through difficult periods in their lives. Patients and families sometimes wish to show their appreciation for a job well done by giving gifts to their caregivers. These gestures are well intentioned, but accepting these gifts could have unintended consequences. Accepting gifts from patients could give the impression that you are favoring that person or giving special treatment. It could also give the impression that you are taking advantage of the patient.

Kindred at Home prohibits accepting gifts or tips, including cash or cash equivalents, from patients or family members regardless of amount. If a patient or family member offers you a gift or tip, you should thank them for their generosity and politely decline, citing Kindred at Home's policy. For similar reasons, you must never request or accept loans from patients or their families. In some states, accepting loans from patients is against the law. In every case, it is a violation of Kindred at Home policy and may result in disciplinary action up to and including termination of employment.

Patient Inducements

The Civil Monetary Penalties Law prohibits any person from offering or transferring anything of value to any individual eligible for benefits under Medicare or Medicaid that the person knows or should know will influence that individual to order or receive service from a particular provider. Accordingly, Kindred at Home does not give free or discounted items or services to a patient in order to encourage the patient to choose us as a service provider.

Gifts to Government Officials

As a general rule, federal laws and the laws of most states prohibit giving anything of value to government officials with the intent to influence the decisions of government. In accordance with these laws, Kindred at Home does not permit anything of value being provided to federal or state government officials regardless of intent.

For additional information and guidance on acceptable gifts, please see the following Kindred at Home policy: ECP 18.0 Gift Policy.

Antitrust Laws

Following our commitment to integrity, Kindred at Home complies with the letter and spirit of the antitrust laws of the United States. These laws are designed to foster free and open competition in the marketplace. Employees are strictly prohibited from participating in any discussion, understanding, agreement, plan or scheme—formal or informal—with any competitor or potential competitor that restricts competition. Examples of activities that could violate the antitrust laws include making arrangements or having discussions with competitors about prices, price levels and market territories, or refusing to deal with certain customers.

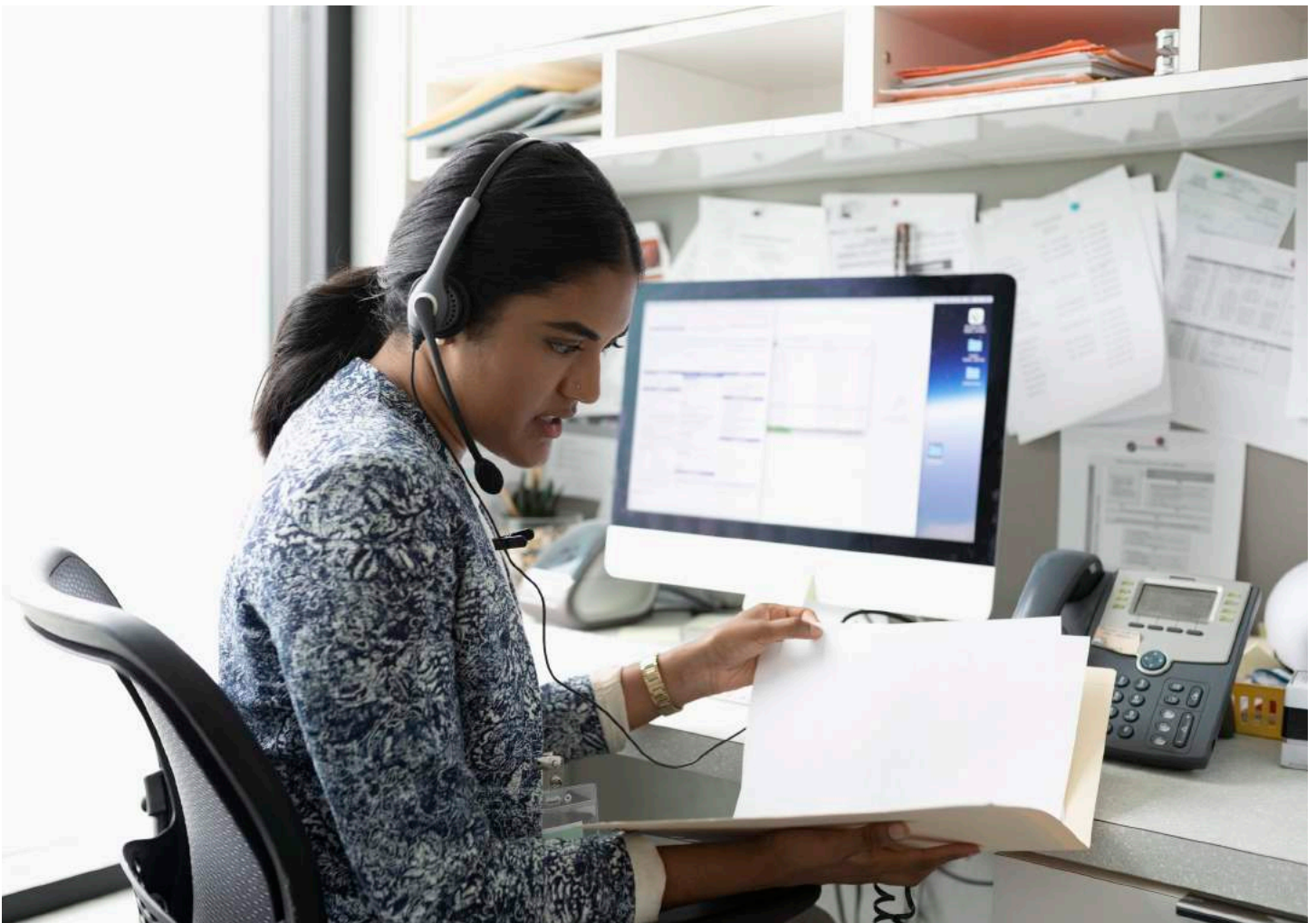
Health, Safety and Environmental Laws

Employees should be familiar with and follow the Health, Safety and Environmental laws, policies and procedures that relate to their surroundings. This includes requirements designed to protect employees from potential workplace hazards.

For additional guidance on applicable health, safety, and environmental laws, please see the following Kindred at Home policy: OSHA 05.17.

KEY TAKEAWAYS

- You must be familiar and comply with the laws, policies and procedures that apply to your day-to-day responsibilities at Kindred at Home.
- Ask questions if you are ever unsure of what to do.
- You must report any reasonable suspicion of a legal violation to Kindred at Home.



EMPLOYEE ACTIVITIES

Kindred at Home's Confidential Information

Confidential information about Kindred at Home's business is a valuable asset and is intended for use only within Kindred at Home. All information concerning our finances, operations, products, policies, customers, development plans, computer programs and related information should be treated as confidential. This information should not be released to anyone outside of Kindred at Home, including competitors, suppliers, outside contractors or business associates, except as may be required by law.

Property, Equipment and Supplies

Kindred at Home resources should be used for authorized business purposes only. Kindred at Home's assets, property, facilities, equipment and supplies should be protected against loss, theft, damage and misuse.

Protection of Electronic Information

Much of Kindred at Home's business is conducted through electronic means. To safeguard our resources, you have a responsibility to:

- Use extreme caution when opening email attachments from unknown or suspicious senders.
- Never install unauthorized software, applications, hardware or storage devices on any computer issued to you by Kindred at Home – use only software that is legally licensed to Kindred at Home.
- Protect your passwords, never sharing them with others in or outside of Kindred at Home.

You should be aware that any information you create, send, receive, download or store on our systems belongs to Kindred at Home, and we reserve the right to review and monitor its

use at any time without notifying you, to the extent permitted by law.

For additional guidance on the protection of electronic information, please see the following Kindred policies: ECP 16.1 Security Policies and Home Health 06.10 Identity Theft Procedures.

Employee Information

Kindred at Home employee and personnel files are also confidential. Only individuals authorized by Kindred at Home policy and state and federal law will have access to employee records.

For additional guidance regarding the access and maintenance of employee records, please see the following Kindred at Home policy: ECP 05.20 Record Retention.

Public Communications and Social Media

Only authorized employees can make public statements on behalf of Kindred at Home. If you are contacted by a reporter, blogger, analyst or the public requesting comments, do not respond. Immediately refer the inquiry to the **Marketing and Communications Team by contacting the Director of Corporate Communications, Megan Friedman at 770.951.6317 or 770-296-1444 (mobile) or megan.friedman@gentiva.com or the Vice President of Marketing and Communications, Paula Shoemaker at 205-515-9711 (mobile) or paula.shoemaker@gentiva.com.** Kindred at Home respects the right of any employee to maintain a personal blog or social media profile outside of the workplace on their own time. However, only authorized employees may engage in social networking or blogging on behalf of Kindred at Home. When engaging in personal social networking, express only your personal opinions and ensure that your views cannot be misunderstood as those of Kindred at Home. Kindred at Home reserves the right to monitor all public blogs and social networking forums. For additional information and guidance regarding

appropriate public communications and social media use, please see the following Kindred at Home policy: ECP 05.20 Record Retention.

Conflicts of Interest

A conflict of interest exists if you have an interest that interferes, or appears to interfere, with your responsibilities at work or that may affect your judgment when working on behalf of Kindred at Home. Employees have a responsibility to put the interests of Kindred at Home and our patients and residents ahead of any other business interests. Kindred at Home employees should not engage in any activities that conflict with Kindred at Home's interests.

Some situations that may give rise to a conflict of interest include, but are not limited to:

- A Kindred at Home employee accepts outside employment from or contracts with an organization that does business with or is a competitor of Kindred at Home.
- A Kindred at Home employee or an immediate family member has a material financial interest in an organization that does business with or is a competitor of Kindred at Home.

Actual or potential conflicts of interest must be disclosed to supervisors upon hire or as they occur. All reported conflicts must be reviewed by the Compliance Department. This includes any additional employment accepted while working for Kindred at Home, arrests, and convictions Actual or potential conflicts of interest that are not approved or ratified by an employee's supervisor or the Compliance Department may subject the individual to disciplinary action, up to and including termination of employment, taking into account appropriate and relevant facts. When in doubt, it is best to disclose as part of Doing What's Right.

For additional guidance on what constitutes a conflict of interest and the procedure for disclosure, please see the following Kindred at Home policies: ECP 20.0 Conflict of Interest and ECP 20.1 Conflict of Interest Disclosure Statement.

Document Retention

All business documents and clinical records, in any form or medium, created or received by an employee are to be retained in accordance with applicable law and Kindred at Home policy.

For additional information and guidance regarding Kindred at Home's document retention requirements, please see the following Kindred at Home policy: ECP 05.20 Record Retention.

Contractors and Vendors

All contractors or vendors conducting business on behalf of Kindred at Home must adhere to all applicable laws and regulations. They are also encouraged to have their own compliance program and are expected to comply with the standards of Kindred at Home's Code of Conduct.

Contractors providing care on Kindred at Home's behalf must maintain and show proof of licensure, certification or other evidence of provider competency.

For additional guidance regarding contractor and vendor compliance obligations, please see the following Kindred at Home policies: ECP 1.0 Compliance Program, ECP 2.0 Covered Person and Covered Contractor Training Requirements and ECP 3.0 Code of Conduct.

Licensure and Certification

Based on your position at Kindred at Home, you may be required to maintain a license or certification in order to comply with state and federal laws. Each employee is expected to maintain such license or certification in good, active standing. Employees are responsible for renewing, verifying and validating their information with the respective licensure or certification board. In the event that any disciplinary action is taken against a license or certification, the employee must report the action or potential action to their supervisor.

For additional information and guidance on licensure and certification requirements, please see the following Kindred at Home policies: ECP 2.0 Covered Person and Covered Contractor Training Requirements, 06.02 Licensure-Certification: State, Federal, and Local Permits, 06.04 Physician Licensure Verification, 06.05 Laboratory Certification CLIA, 06.06 State Laboratory Licensure.

Exclusion Programs

Kindred at Home does not employ, contract with, grant privileges to, or enter into any type of arrangement with individuals or entities currently excluded by the Office of the Inspector General (“OIG”) or debarred by the General Services Administration (“GSA”) from participating in federal programs, including Medicare or Medicaid. In addition to federal exclusion programs, some states have enacted Medicaid exclusion lists. Kindred at Home does not employ or do business with individuals excluded under state exclusion lists. Before employing or conducting business with any individual or entity, they must be screened against both federal and state exclusion lists.

As an employee of or vendor for Kindred at Home, you are expected to immediately notify Kindred at Home if you receive notice that you have been placed on an exclusion list.

For additional guidance on Kindred at Home’s screening requirements, please see the following Kindred at Home policies: ECP 9.0 OIG and GSA Screening and ECP 9.1 Notice of OIG-GSA Screening.

Discrimination-Free and Harassment-Free Workplace

Kindred at Home operates as an equal opportunity/affirmative action employer and prohibits all forms of discrimination and harassment due to a person’s race, color, religion, gender, sexual orientation, military duty, age, national origin, disability or veteran’s status, or any other basis protected by federal, state or local law. All officers, employees and contractors share in the responsibility of preventing

discrimination and harassment and should report any witnessed instances of this conduct.

Harassment can take many forms, all of which are unacceptable at Kindred at Home. Prohibited conduct includes jokes, threats, or other unwelcome actions. Unwelcome sexual advances, requests for sexual favors, or other unwelcome verbal, nonverbal, or physical contact or the display of sexually suggestive material are also unacceptable and will not be tolerated.

To deliver on Kindred at Home’s commitment to Doing What’s Right, we work toward the highest degree of performance, behave professionally at all times, and promote high standards and integrity. This includes communicating respectfully and behaving properly at all times.

What should I do if I experience or witness discrimination or



harassment in the workplace?

You should report such occurrences through one of the following methods:

- Your supervisor or other manager up the chain through the Open Door Policy (including Kindred at Home's HR Department).
- The Compliance or Legal Departments.
- Compliance Helpline (800.359.7412) or email (KAHcompliance@kindred.com).

For more information regarding, please refer to the Kindred at Home Employee Handbook and the following Kindred at Home policies: 06.11 Non-Discrimination, 06.12 Section 504 Coordinator and 06.13 Section 504 Grievance.

KEY TAKEAWAYS

- Kindred at Home's confidential information, assets and resources must be protected and used for authorized purposes only.
- You must disclose actual or potential conflicts of interest to your supervisor.
- All contractors, vendors and other third parties must be appropriately authorized, licensed and certified in order to do business with Kindred at Home.
- Any form of discrimination or harassment is strictly prohibited.



CERTIFICATE OF COMPLIANCE

1. I have read the entire Code of Conduct. I have had the opportunity to ask any questions with regard to its contents, and I understand fully how it relates to my position.
2. I hereby acknowledge my obligation and agreement to fulfill those duties and responsibilities as set forth in the Code of Conduct and to be bound by those standards.
3. I further certify that, throughout the remainder of my association with Kindred at Home, I shall continue to comply with the terms of the Code of Conduct.
4. I understand that violations of the Code of Conduct may lead to disciplinary action, including discharge.

Signature

Date

Printed Name

Title/Position

Facility Name

Business Telephone Number (with Area Code)

The first copy is to be retained by the employee/officer/Board Member/contractor.
The second copy is to be retained for the employee/officer/Board Member/contractor's record.



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NOTES

Lined area for notes, consisting of two columns of horizontal lines.