

We Work with and Value Integrity

The Kennedy Collective
Code of Ethics and Business Conduct

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A Message From Our CEO

Fulfilling Our Promises

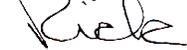
For over 69 years, we've unleashed the abundant potential in those with disabilities and worked to share their gifts and talents with the world. We're proud of our legacy, our reputation, and the promises we fulfill in providing support and services that bring out the best in each of us.

The Kennedy Collective has always stood as a source of support and inspiration, but our name must stand for something more – the unwavering integrity of every Kennedy Collective employee. That is why we have our Code of Ethics and Business Conduct – to help each of us live and work with that ideal in mind.

The Code is our tool for making good decisions and working as a team, dedicated to the happiness and fulfillment of those we serve, to each other, and to our community. Read the Code carefully and look to it whenever the right path is unclear. Speak up when you have questions or if you see something that may violate the Code, our policies, or the law.

The way we work, present ourselves, and the way we support people matters a great deal – to us and to them. When we stand for dignity, empowerment and understanding, we create futures filled with opportunity and possibility for each of us, and we forward the principle that each of us matters and each of us makes a difference in our communities and the world.

Thank you for all you do to fulfill the promises of The Kennedy Collective.



Richard E. Sebastian, Jr.
President and CEO

All About the Code

Purpose and Overview

Working at The Kennedy Collective is a true honor. Every day brings us opportunities to empower people with different abilities to be heard, to live their best lives, and to experience joy and independence.

Just like the people we serve, every Kennedy Collective employee has their own unique talents and perspectives to contribute. We're all different in our own way, but we do share something in common – our dedication to The Kennedy Collective's success and celebrating every individual's potential.

Our commitment to those individuals is what drives us – doing what's right for them and fulfilling The Kennedy Collective's mission in a spirit of support and service. In that spirit, it's our responsibility to work with integrity, doing what's right in even the smallest decisions we make.

To help you along the way, we have created this Code of Ethics and Business Conduct ("Code"). It is designed with you in mind – a vital resource that will help you:

- Comply with applicable laws, regulations, and Company policies.
- Promote integrity and the highest standards of ethical conduct.
- Address common ethical situations you could encounter in your work.
- Avoid even the appearance of anything improper in connection with our Company's business activities.

All employees of The Kennedy Collective and its subsidiaries, including corporate officers and members of our Board of Directors, are required to read, understand, and follow our Code. Business partners, such as vendors, consultants, and temporary employees who serve as an extension of our organization are also expected to follow the spirit of our Code, as well as any applicable contractual provisions. Any waiver of this Code may be made only by the Board of Directors or a committee of the Board and will be promptly disclosed to stockholders as required by applicable laws, rules, and regulations.

Complying with Laws and Regulations

Our organization is committed to compliance with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, The Kennedy Collective also has other resources that can be of help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgment and to seek help when you need it. Contact your divisional Vice President or the Company Compliance Officer, Valerie Reyher.

Our Responsibilities

Each of us must take responsibility for acting with integrity, even when this means making difficult choices. Meeting our responsibilities is what enables us to succeed and grow.

- Always act in a professional, honest, and ethical manner when acting on behalf of The Kennedy Collective.
- Know the information in the Code and written Company policies and pay particular attention to the topics that apply to your specific job responsibilities.
- Complete all required employee training in a timely manner and keep up-to-date on current standards and expectations.
- Report concerns about possible violations of our Code, our policies, or the law to your manager, an executive, or any of the resources listed in this Code.

- Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies, or the law.

What If?

I'm a manager and not clear on what my obligations are if someone comes to me with an accusation – and what if it involves a senior manager?

No matter who the allegation involves, you must report it. Our Company provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in the Code or another member of management.

Making Good Decisions

Making the right decision is not always easy. There may be times when you'll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, Do the Right Thing. You don't have to be alone in Doing the Right Thing, so seek out the resources available to help you.

Facing a Difficult Decision?

It may help to ask yourself:

- Is it legal?
- Is it consistent with our Code and our Company Values?
- Would I feel comfortable if senior management and others at The Kennedy Collective knew about it?
- Would I feel comfortable if my decision or my actions were made public?

If the answer to all of these questions is "yes," the decision to move forward is probably OK, but if the answer to any question is "no" or "I'm not sure," stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

One More Thing ...

We value your feedback. If you have suggestions for ways to enhance our Code, our policies, or our resources to better address a particular issue you have encountered, bring them forward. Promoting an ethical Kennedy Collective is a responsibility we all share.

Asking Questions and Reporting Concerns

If you see or suspect any violation of our Code, our policies, or the law, or if you have a question about what to do, talk to your manager.

If you're uncomfortable speaking with your manager, there are other resources available to help you:

- Contact another member of management.
- Contact the Compliance Officer or the Vice President of Human Resources.
- Call the Hotline 844-850-2249 or <http://thekennedycenterinc.ethicspoint.com/>.

Our organization will make every reasonable attempt to ensure that your concerns are addressed appropriately.

What to Expect When You Use the Hotline

The Hotline web portal and phone line are available 24 hours a day, seven days a week. Trained specialists from an independent third-party provider of corporate compliance services, will answer your call, document your concerns, and forward a written report to our organization for further investigation.

When you contact the Hotline, you may choose to remain anonymous where allowed by local law. All reports will be treated equally whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, The Kennedy Collective will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember, an issue cannot be addressed unless it is brought to someone's attention.

What If?

Our manager typically does nothing when concerns about potential misconduct are brought to her attention, and I believe she has made things difficult for coworkers who have raised issues. I have a problem – a coworker is doing something that I believe to be ethically wrong. What should I do?

Take action and speak up. You are required to report misconduct. While starting with your manager is often the best way to efficiently address concerns, if you do not believe that it is appropriate or do not feel comfortable doing so, you should talk to another member of management, or any of the resources listed in the Code.

What If?

Someone misused the Hotline, made an anonymous call, and falsely accused someone of wrongdoing.

Experience has shown that the Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on calls, and anyone who uses the Hotline in bad faith to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation, will be subject to disciplinary action.

Our Non-retaliation Policy

We will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report of actions that may be inconsistent with our Code, our policies, or the law, or who assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

What If?

I suspect there may be some unethical behavior going on in my business unit involving my manager. I know I should report my suspicions, and I’m thinking about using the Hotline, but I’m concerned about retaliation.

You are required to report misconduct and, in your situation, using the Hotline is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.

Accountability and Discipline

Violating our Code, our policies, or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk. If an ethics or compliance problem does occur, you are required to report it so that an effective solution can be developed. You should also understand that violations of laws or regulations may result in legal proceedings and penalties including, in some circumstances, criminal prosecution.

Looking Out for Each Other by Being Safe and Respectful

Diversity, Equal Opportunity, and Non-discrimination

The Kennedy Collective helps bring together employees with a wide variety of cultures, backgrounds and skills. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

Our colleagues, job applicants, and business partners are entitled to respect and should be judged on the basis of their qualifications, demonstrated skills, and achievements.

We support laws prohibiting discrimination based on protected characteristics such as a person's race, color, gender, national origin, age, religion, disability, veteran status, marital status, or sexual orientation.

Do the Right Thing

- Treat others respectfully and professionally.
- Promote diversity in hiring and other employment decisions.
- Do not discriminate against others on the basis of any other characteristic protected by law or Company policy.
- Remember, what is funny to one person may be perceived as offensive or inappropriate to another. Before you speak or share a joke, consider how others could interpret what you say.
- If you make a mistake and someone tells you they are offended by something you said or did, listen to their concerns, apologize, and commit to doing better.

Stay Alert For

- Comments, jokes, or materials, including emails, which others might consider personally distasteful, insulting, bigoted, harassing, or bullying.
- Inappropriate bias when judging others. If you supervise others, judge them on performance. Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards.

What If?

One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

You should notify your manager or divisional Vice President. Sending these kinds of jokes violates our Values as well as our policies that relate to the use of email and our standards on diversity, harassment, and discrimination. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

Harassment-free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, and abuse.

Verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

At The Kennedy Collective, We Do Not Tolerate:

- Threatening remarks, obscene phone calls, stalking, or any other form of harassment.

- Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- Threatening, intimidating, or coercing others on or off the premises – at any time, for any purpose.

Do the Right Thing

- Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- Never tolerate sexual harassment including requests for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature.
- Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

Stay Alert For

- Unwelcome remarks, gestures, or physical contact.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- Verbal abuse, threats, or taunting.

Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions such as a request for a date, a sexual favor, or other similar conduct of a sexual nature.
- An intimidating, offensive, or hostile work environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.

What If?

While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office and it was after regular working hours, so I wasn't sure what I should do. Is it harassment?

Yes, it is. This type of conduct is not tolerated, not only during working hours but in all work-related situations, including business trips. Tell your colleague such actions are inappropriate and must be stopped, and if they continue, report the problem.

What If?

I just learned that a good friend of mine has been accused of sexual harassment and that an investigation is being launched. I can't believe it's true and I think it's only fair that I give my friend an advance warning or a "heads up" so he can defend himself. Don't I have a responsibility as a friend to tell him?

Under no circumstances should you give him a "heads up." Your friend will be given the opportunity to respond to these allegations and every effort will be made to conduct a fair and impartial investigation. An

allegation of sexual harassment is a very serious matter with implications not only for the individuals involved but also for our Company. Alerting your friend could jeopardize the investigation and expose The Kennedy Collective to additional risk and possible costs.

Health and Safety

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others.

We can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone. Situations that may pose a health, safety, or environmental hazard should be reported immediately. All reports can be made without fear of reprisal.

Safety is a condition of employment, and we expect the commitment of each director, officer, and employee to make The Kennedy Collective an accident-free workplace.

Do the Right Thing

- Follow the safety, security, and health rules and practices that apply to your job.
- Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Maintain a neat, safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.

Stay Alert For

- Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as facility entry procedures and password protocols.

Alcohol and Drugs

While at work or on Company business:

- You should be always ready to carry out your work duties – never impaired.
- Do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm our Company's reputation.

Workplace Violence

Violence of any kind has no place at The Kennedy Collective. We won't tolerate:

- Intimidating, threatening, or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage, or other criminal activities.
- The carrying of weapons onto Company property unless you are authorized to do so.
- Possession of a firearm, explosive, or other dangerous weapon on Company premises or use of an object as a weapon.
- Inflicting or threatening injury or damage to another person's life, health, well-being, family, or property.

What If?

I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.

Discuss your concerns with your manager or divisional Vice President. There may be very good reasons for the practices, but it's important to remember that raising a concern about safety does not make you a troublemaker, but a responsible employee concerned about the safety of others.

What If?

A subcontractor commits a violation of our standards. Are subcontractors expected to follow the same health, safety, and security policies and procedures as employees?

Absolutely. Managers are responsible for ensuring that subcontractors and vendors at work on Company premises understand and comply with all applicable laws and regulations governing the particular facility, as well as with additional requirements The Kennedy Collective may impose.

Protecting Our Organization

Our Company Assets

We are entrusted with Company assets and are personally responsible for protecting them and using them with care. Company assets include funds, facilities, equipment, information systems, intellectual property, and confidential information.

Personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment.

Do the Right Thing

- Do not use Kennedy Collective equipment or information systems to create, store, or send content that others, especially those in a marginalized group might find distasteful, insulting, bigoted, harassing, or bullying.
- Do not share passwords or allow other people, including friends and family, to use Company resources.
- Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Company computers or other equipment to conduct Company business is strictly prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the IT Department.

Stay Alert For

- Requests to borrow or use our Company equipment without approval.
- Unknown individuals without proper credentials entering our facilities.
- Excessive use of Company resources for personal purposes.

Confidential Information and Intellectual Property

Our organization commits substantial resources to protecting the personal information of persons served, staff, customers, business partners, and prospects. This includes information within our electronic database, shared drives, OneDrive and other Company-dedicated software.

Each of us must be vigilant and protect organization confidential information and intellectual property. This means keeping it secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

Be aware that the obligation to restrict your use of Kennedy Collective confidential information and intellectual property continues even after employment ends.

Do the Right Thing

- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- Use and disclose confidential information only for legitimate business purposes.
- Protect our confidential information (including any information belonging to our customers, third parties, or the people and families we serve). Share it only with authorized parties.
- Only store or communicate Company information using Kennedy Collective information systems.

Stay Alert For

- Discussions of Company confidential information in places where others might be able to overhear – for example, in the community, and on elevators, and when using mobile phones.
- Sending confidential information to unattended fax machines, or printers, or unsecure email.

Intellectual Property

Intellectual property (IP) is an important asset that must be protected. Examples of our IP include:

- Business and marketing plans
- Pricing documents
- Company initiatives (existing, planned, proposed, or developing)
- Customer lists
- Trade secrets and discoveries
- Methods, know-how, and techniques
- Innovations and designs
- Systems, software, and technology
- Patents, trademarks, and copyrights

Contact the President/CEO's office if you receive any statements or questions from third parties regarding (1) the scope of The Kennedy Collective intellectual property rights, (2) the applicability of our Company rights to another company's products or (3) the applicability of a third party's intellectual property rights to our Company intellectual property rights or products.

Promptly disclose to Company management any inventions or other IP that you create while you are employed by The Kennedy Collective.

Accurate Recordkeeping

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and to supporting stakeholders, funders, donors, customers, business partners, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area. If you are involved in any aspect of our financial reporting, make sure you meet all applicable procedural and legal requirements. Take care to ensure reports or disclosures about our financial records are full, fair, accurate, complete, objective, and timely, and never falsify or mischaracterize any book, record, account, entry, or transaction that relates to our organization.

Records Management

Documents should only be disposed of in compliance with Kennedy Collective policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact the Compliance Officer.

Remember, everyone at our Company contributes to the process of recording business results and maintaining records. Whether you are filing an expense report, preparing a financial statement, or simply completing a time sheet, be honest, accurate, and complete.

Do the Right Thing

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all of your business communications. Write as though someday the records you create may become public documents.

Stay Alert For

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets, or liabilities.
- Improper destruction of documents.

What If?

At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

No, you didn't. Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.

Responsible Communications

We are committed to maintaining honest, professional, and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public. For this reason, it is important that only authorized persons speak on behalf of our Company. Communications with media, funders, and other members of the community should be referred to executive management.

Full, Fair, and Timely Disclosures

The Kennedy Collective is committed to meeting its obligations of full, fair, and timely disclosure in all reports and documents that describe our business and financial results, and other public communications.

Stay Alert For

- Giving public speeches, writing articles for professional journals or other public communications that relate to our Company without appropriate management approval.
- The temptation to use your title or affiliation outside of your work for The Kennedy Collective without it being clear that the use is for identification only.
- Invitations to speak "off the record" to journalists or analysts who ask you for information about our Company or its customers or business partners.

Be careful when writing communications that might be published online. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic

communications, even under an alias, never give the impression that you are speaking on behalf of The Kennedy Collective.

If you believe a false statement about our Company has been posted, do not post or share nonpublic information, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact the Communications Director.

Doing the Right Thing and Being Trustworthy

Compliance with State and Federal Regulations

We comply with all applicable state and federal regulations/laws that regulate our business. Many of these laws concern the way we promote and sell our goods and services. It is never acceptable to try to influence decisions in any way that is unethical, inappropriate, or illegal, or creates a potential conflict of interest. We are honest, open, and up-front when we interact with those who may be interested in contracting, buying, or prescribing our goods and services.

The Laws That Apply to Our Business

We abide by all laws, regulations, policies, and procedures that apply to our jobs, outlined in our contract obligations and in our communities including and not limited to:

- Rules and regulations of our State of Connecticut funding agencies including but not limited to Department of Developmental Services (DDS), Department of Mental Health and Addiction Services (DMHAS), and the Bureau of Rehabilitation Services
- The Federal Acquisition Regulations (FAR)
- Regulations related to The AbilityOne Program
- U.S. False Claims Act. We don't submit or cause the submission of false claims for healthcare reimbursement to the government.
- U.S. Anti-kickback Statute. We don't give anything of value to induce a government official to use or recommend our goods or services that are paid for or reimbursed by the government.
- Transparency Laws. We report certain payments to customers, as required by transparency laws and regulations in every location where we operate.

Do the Right Thing

- Understand how these laws apply to your job and ask for guidance from your divisional Vice President if you are ever unsure of the proper course of action.

Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest that may interfere with your ability to make an objective decision on behalf of The Kennedy Collective. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your manager so that we can properly evaluate, monitor, and manage them.

Do the Right Thing

- Avoid conflict of interest situations whenever possible.
- Always make business decisions in the best interest of our organization.
- Discuss with your manager full details of any situation that could be perceived as a potential conflict of interest.
- Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with The Kennedy Collective.

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

Corporate opportunities

If you learn about a business opportunity because of your job, it belongs to our Company first. This means that you should not take that opportunity for yourself unless you get approval from your divisional Vice President or President/CEO.

Friends and relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, supplier, or an individual or family we serve. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your manager in order to determine if any precautions need to be taken.

Outside employment

To ensure that there are no conflicts and that potential issues are addressed, you always need to disclose and discuss outside employment with your manager and report it to the Vice President of Human Resources. If approved, you must ensure that the outside activity does not interfere with your work at The Kennedy Collective. Please note, if you accept employment with The Kennedy Collective, we consider that acceptance as meaning The Kennedy Collective as your employer has expectations that must be met. Working for a competitor, supplier, or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with our Company.

Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, vendor, supplier, or customer. Make sure you know what's permitted – and what's not – by our policies and seek help with any questions.

Civic activities

Unless Company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, suppliers, customers, or partners, especially if your current job gives you the ability to influence our relationship with them.

Fair Dealing

We treat our individuals, employees, customers, business partners, and stakeholders fairly. We work to understand and meet their needs, while always remaining true to our own ethical standards. We tell the truth about our services and capabilities and never make promises we can't keep.

In short, we treat our all as we would like to be treated.

Do the Right Thing

- Treat each customer fairly and honestly.
- Speak up and talk to your manager if you have concerns about any error, omission, undue delay, or defect in quality or our customer service.

- Promptly raise with a manager any potential conflict of interest between you, our customers, or our Company.
- Never follow a customer's request to do something that you regard as unethical or unlawful.
- Be responsive to customer requests and questions. Only promise what you can deliver and deliver on what you promise.

Stay Alert For

- Pressure from colleagues or managers to cut corners on quality or delivery standards.
- Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision.

Interactions with the Government

We are committed to meeting the many special legal, regulatory, and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, invoices, subcontracting, employment practices, contract performance, gifts and entertainment, purchasing, and other matters. These requirements may also flow down to individuals and companies working on our behalf. Make sure you know and follow the laws, regulations, our Code, and our Company policies as they relate to government-related work.

Gifts and Entertainment

A modest gift may be a thoughtful "thank you," or a meal may be an appropriate setting for a business discussion. If not handled carefully, however, the exchange of gifts and entertainment may appear to create a conflict of interest or other misconduct. This is especially true if it happens frequently, or if the value is large enough that someone may think it can improperly influence a business decision. Proper records of such expenses must also be created and maintained.

We do not accept or provide gifts, favors, or entertainment – even if it complies with our policies – if the intent is to improperly influence any decision.

Do the Right Thing

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Exchange gifts and entertainment that foster goodwill in business relationships, but never provide or accept gifts or entertainment that obligate or appear to obligate the recipient.
- Never provide to or accept gifts from government employees, regulators, or officials. We must be openly transparent and abide by governmental contracting rules related to gifts.
- Never accept gifts of any kind from a business partner with whom you are involved in contract negotiations.
- We must be especially mindful of accepting gifts from the individuals and families we support. While the intent may be one of gratitude and appreciation, we must be very aware that whatever we accept is appropriate and of nominal value. Please inform your manager of any gift that is received.
- Understand and comply with the policies of the recipient's organization before offering or providing gifts, favors, or entertainment.
- Never accept cash or cash equivalents.
- Do not request or solicit personal gifts, favors, entertainment, or services.

- Raise a concern whenever you suspect that a colleague, third party, or other agent of the Company may be engaged in any attempt to improperly influence a decision of a customer or government official.

Stay Alert For

- Situations that could embarrass you or our Company, including entertainment at sexually oriented establishments.
- Gifts, favors, or entertainment that may be reasonable for a privately owned customer but not for a government official or agency.

What If?

When traveling, I received a gift from a business partner that I believe was excessive. What should I do?

You need to let your divisional Vice President know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.

What If?

During contract negotiations with a potential new supplier, the new supplier mentioned that they had a complimentary registration to a local business seminar. They are unable to attend and asked if I would like to go in their place. I had been thinking of attending the seminar anyway, since the subject of the seminar applies to my work. There's no personal gain to me, it would be good for The Kennedy Collective, and it would be a shame to waste the registration. I planned on saying "yes," but now I wonder if that would be the right decision.

You should decline the offer. If you are involved in contract negotiations, you must never accept any gifts while the negotiation process is ongoing. Accepting gifts during negotiations can give the appearance of something improper and is always inappropriate.

Cooperation with Investigations and Audits

All employees are expected to fully cooperate with internal and external investigations and audits that are conducted by our Company. In addition, in the course of business, you may receive inquiries or requests from government officials.

You are expected to fully cooperate and ensure that any information you provide is true, accurate, and complete. If you learn of a potential government investigation or inquiry, immediately notify your manager and President/CEO before taking or promising any action.

Stay Alert For

- Falsified information. Never destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- Unlawful influence. Never provide or attempt to influence others to provide incomplete, false, or misleading statements to a Company or government investigator.

Individual Responsibility and Accountability

Interactions with Others

The way we interact with those we work with directly impacts The Kennedy Collective's reputation, so we use care in every interaction with:

Healthcare Providers

We put individuals first. In our interactions with healthcare professionals, we promote dignity and respect by observing good business practices, meeting industry standards, and complying with Kennedy Collective policies.

We also comply with federal and state laws that govern our relationships with healthcare professionals, including the U.S. Anti-kickback Statute and the Stark Law. Make sure that any interactions are professional and serve a legitimate business purpose, and never engage in any conduct that is intended to – or could even suggest the appearance of – improperly influencing a healthcare professional's decision.

Suppliers

The Kennedy Collective evaluates and engages with qualified suppliers (including vendors) on an objective basis grounded in fairness. When selecting suppliers, we assess each supplier's ability to satisfy our business and technical needs and requirements. We also make purchasing decisions based on the long-term cost and benefit to our Company. All agreements are negotiated in good faith and must be fair and reasonable for both parties.

The People We Serve

Our goal is to provide care and support to every individual and family we serve. While there may be times when we pay special care and attention to certain individuals, we are careful to keep our relationships friendly and professional. We understand the importance of maintaining healthy boundaries in our relationships with clients, never allowing a positive, personal connection to cross the line to become an exploitative or abusive one.

Do the Right Thing

- Never pay or offer to pay anyone, including colleagues, physicians, or any other provider to refer an individual. If you are offered any kind of payment for a referral, turn it down.
- Do not offer or give anything of value to influence or reward prescribing, using, purchasing, leasing, or recommending certain products or services.
- If you form a personal relationship with an individual or their family by contacting or spending time with them when you are off-duty, keep that relationship positive and appropriate.

Stay Alert For

- Gift-giving – federal and state laws and our policies strictly limit what we may give others in the way of gifts, entertainment, promotional items, and other hospitality and business courtesies.
- Improper influence – don't interfere with a professional's independent judgment. If we disagree, our recourse is to seek an additional professional opinion.
- Maintaining professional boundaries – be mindful of our connections with individuals, families, stakeholders, or business partners that may infringe upon the ability to carry out our ethical business responsibilities.

- Inappropriate personal attachments – don't allow a personal relationship with an individual or their family to become abusive (either physically or psychologically), exploitative, or inappropriate in any way.

What If?

I have built a friendship with one of our clients this year. I'm aware that he will be alone on his birthday. Would it be OK to ask him to come and have dinner with my family to celebrate – and maybe give him a gift?

Yes. This is an example of an act you would take in a positive and appropriate personal relationship. You're acting as a friend, showing this individual that you care about him and want to celebrate his birthday. Giving him a gift is also acceptable, as long as the gift is not extravagant or otherwise inappropriate.

Privacy Protection

We respect the personal information of others. Follow our policies and all applicable laws in collecting, accessing, using, storing, sharing, and disposing of sensitive information. Only use it – and share it with others outside of our Company – for legitimate business purposes and with the written, authorized approval of the individual or his/her designee.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, or credit card number.

Privacy and HIPAA

The Kennedy Collective complies with laws such as the Health Insurance Portability and Accountability Act (HIPAA) which protect the privacy of personally identifiable information (PII) and protected health information (PHI). We collect only the minimum PHI or PII needed to perform our work and use it only for legitimate business purposes.

- **PII is information that can be used to trace someone's identity or can be combined with other personal information to do so (for example, a name, address, social security number, driver's license number, or account number).**
- **PHI is a specific type of personal information that identifies an individual and relates to a person's physical or mental health, treatment, or payment for health care.**

Stay Alert For

- Sending sensitive information to unattended fax machines, printers, email, or other electronic recipients.
- Failing to shred or securely dispose of sensitive information.
- Using "free" or individually purchased internet hosting, collaboration, or cloud services.

Reporting of Adverse Events

We have an obligation to report any issue that could compromise the quality or safety of the people we serve and support.

If you see, suspect, or become aware of a situation that is unsafe, doesn't comply with our Company quality policies or procedures, or could adversely affect the people we serve, you have a responsibility to

immediately take action to stop the action that is unsafe. We are each obligated to report any abuses and take immediate action for addressing an abuse and neglect situation; to immediately bring it to the attention of your manager or divisional Vice President. By acting quickly, you help us to address and correct the issue before it presents a risk.

Fraud, Waste, and Abuse Prevention

Our Company is committed to the integrity of the healthcare system and to detecting, correcting, and preventing false claims. As part of this commitment, we expect our employees to be able to recognize and report instances of fraud, waste, and abuse.

Each of us has a responsibility to ensure services billed represents services rendered and that any payments and transactions are properly authorized and fully and accurately recorded in compliance with all applicable laws and Company policies.

Do the Right Thing

- Complete all required training and know the definitions of “fraud,” “waste,” and “abuse.”
- Ensure timely and accurate documentation, coding, and billing that reflect services authorized/requested and actually performed.
- Only bill for services we actually provide.
- Promptly report any instances of suspected fraud, waste, or abuse.

Stay Alert For

- Activities that constitute fraud, waste, or abuse, such as:
 - Billing for services, procedures, or supplies that have not actually been provided.
 - Intentionally misrepresenting or manipulating information to receive payment for services that were not provided.
- Lack of supporting documentation, where it is required.

Ethical Marketing and Advertising

The Kennedy Collective’s advertising and promotion efforts focus on conveying useful information to individuals, families, stakeholders, customers, and the community at large. We are never misleading or dishonest in our promotions or make promises we can’t keep. Every claim we make must be true – grounded in facts that can be backed up by well-documented evidence.

Building a Better World

Environmental Protection

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers, and the public.

Do the Right Thing

- Do your part to ensure that protecting team member safety and the environment is a priority. Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- Read and understand all the information provided by our Company that is relevant to your job and the health, safety, and environmental effects of our operations.
- Fully cooperate with environmental, health, and safety training, and with our Company's periodic compliance reviews of our products and operations.
- Be proactive and look for ways that we can minimize waste, energy, and use of natural resources.
- Contact our HR Training & Safety Coordinator if you have any questions about compliance with environmental, health and safety laws, and policies.

Political Activities

Many of us have a right to voluntarily participate in the political process, including making personal political contributions. However, please note that does not apply to Officers of our Company, and we must abide by the rules set forth by our various governmental funders and contract providers. Each employee must always make it clear that your personal views and actions are not those of our organization, and never use Company funds for any political purpose.

Do the Right Thing

- Ensure that your personal political views and activities are not viewed as those of the Company.
- Do not use our resources or facilities to support your personal political activities.

Stay Alert For

- Lobbying. Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the President/CEO.
- Pressure. Never apply direct or indirect pressure on another employee to contribute to, support, or oppose any political candidate or party.
- Improper influence. Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.
- Conflicts of interest. Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at The Kennedy Collective.

What If?

I will be attending a fundraiser for a candidate running for local office. Is it OK to mention my position at The Kennedy Collective as long as I don't use any Company funds or resources?

No. It would be improper to associate our name in any way with your personal political activities. Employees should also not wear Kennedy Collective employee badges or identification.

What If?

I would like to invite an elected official to speak at an upcoming Company event. Would that be a problem?

You must get approval from the President/CEO before inviting an elected official or other government official to attend a Company event. If the invitee is in the midst of a reelection campaign, the Company event could be viewed as support for the campaign. Depending on local laws, any food, drink, or transportation provided to the invitee could be considered a gift. In most cases, there would be limits and reporting obligations.

Community Social Responsibility

We believe in making a positive difference in people's lives and maintaining the health and welfare of the communities where we live and work. We promote, encourage, and support a diverse range of corporate social responsibility activities. You are encouraged to get involved in the many initiatives we support.

We also encourage you to make a difference on a personal level, but, in general, ask that you do so on your own time and at your own expense, making sure that your activities are lawful and consistent with our policies. Unless you receive approval in advance, please do not use Kennedy Collective funds, assets, or The Kennedy Collective name to further your personal volunteer activities.

Make Your Commitment

At The Kennedy Collective, we believe in following all applicable laws and regulations. All Company employees must complete and submit this Commitment Form annually and participate in all required ethics and compliance training.

Attesting to this form indicates that you have read and understood our Code of Ethics and Business Conduct and your individual responsibilities:

- Have complied with the Code to the best of your knowledge.
- Have reported any possible conflicts of interest.
- Will contact management or use any of the reporting methods included in this Code if you have concerns related to a team member or business conduct.

Helpful Resources

Resource:	Contact:
Office of the President/CEO	Rick Sebastian rsebastian@thekennedycollective.org 203-365-8522 ext. 2062
Compliance Officer	Valerie Reyher vreyher@thekennedycollective.org 203-365-8522 ext. 2059
The Hotline	Web: http://thekennedycenterinc.ethicspoint.com/ or Phone: 844-850-2249
Legal Consultation	Office of the President/CEO
Corporate Communications Director	Kate Czaplinski kczaplinski@thekennedycollective.org 203-365-8522 ext. 2015
IT Department	IT@thekennedycollective.org