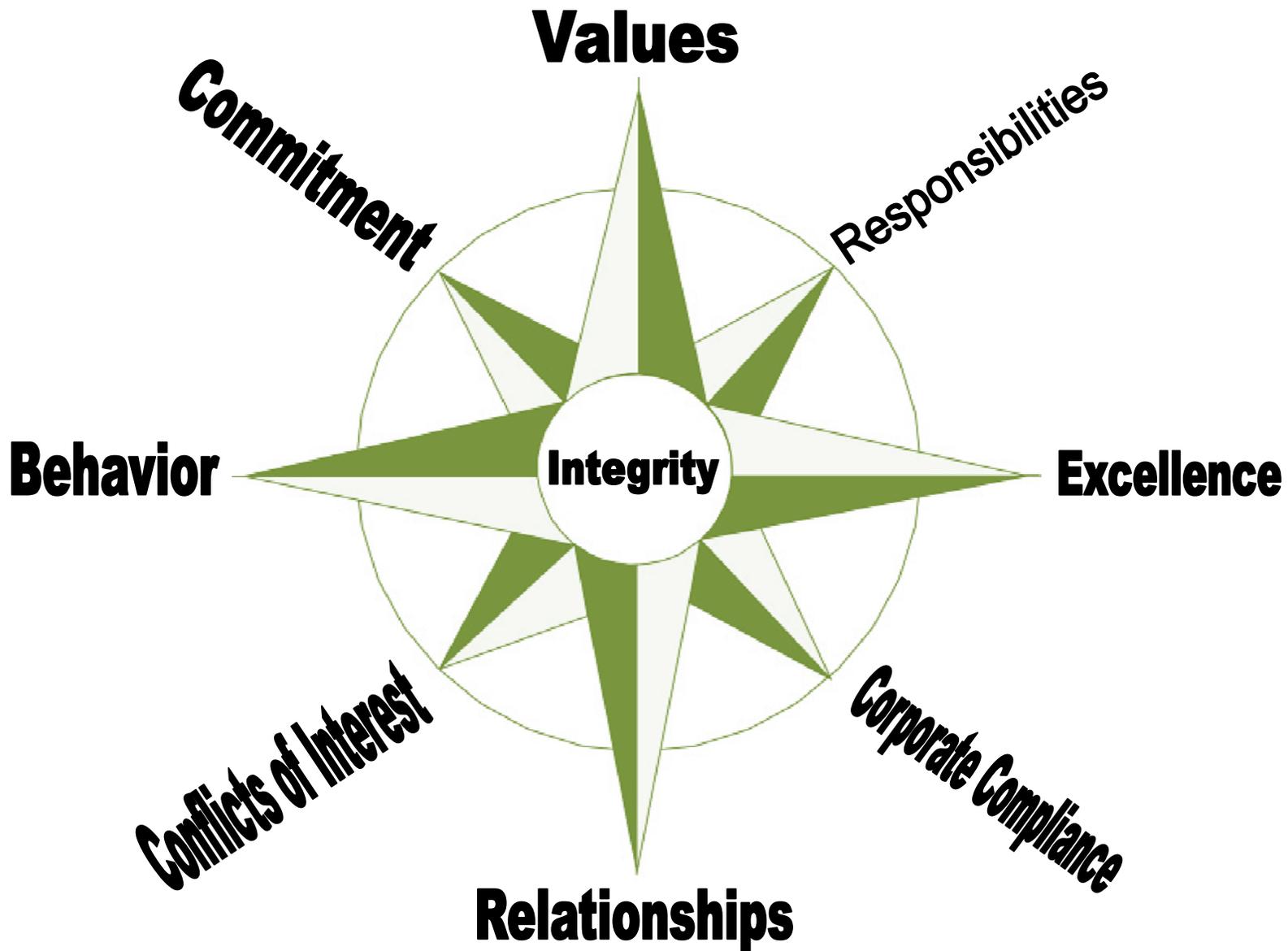
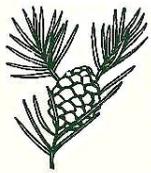


Code of Ethics



PINE HABILITATION AND
SUPPORTED EMPLOYMENT, INC.

PHASE



Pine
Habilitation
And
Supported
Employment, Inc.

Our Mission Statement ...

*PHASE empowers Program Participants
to live, work, and thrive through the
discovery and development of their
individual abilities.*

PHASE CODE OF ETHICS

The PHASE Code of Ethics is an overview of corporate behavior and expectations that creates a positive working environment, and guides us in a way to doing business that is driven by values and integrity. The Board of Directors and all employees of PHASE strive to provide the highest quality support to program participants and customers by:

- Focusing on a shared vision, mission, culture and goals;
- Enjoying a consistent, principled process through which professional behavior and relationships are modeled;
- Ensuring simplified, manageable and enforceable policies and procedures and;
- Adhering to a defined set of ethical conduct that is above reproach.

In order to achieve the highest level of integrity, it is essential that we each perform to our highest capabilities and work together effectively and efficiently. We want to do what is right in the performance of our services and our relationship with stakeholders. Ultimately, this is why we have developed a Code of Ethics for ourselves as the Board of Directors and Employees of PHASE.

The Code of Ethics serves as a standard for our relations with others. It 'sets the bar' for our intention, values and behavior as the stewards of PHASE. Although none of us will completely and always reach the standards set forth in this document, they act as a guide for us in the process of continuous improvement.

The Code of Ethics also serves as a basis for guiding the behaviors of PHASE, and directs the development and implementation of policies and procedures. Through the Code of Ethics, we have the opportunity to hold ourselves accountable for our relationships, work and service. As a condition of employment or membership on the PHASE Board of Directors, all employees and board members will act with the highest integrity and business conduct, and comply with all applicable laws and provisions of the Code of Ethics.

Finally, the Code of Ethics allows new employees and Board Members to fully understand the values and expectations of PHASE. It enables individuals to be more competent and effective, knowing clearly what is expected of oneself and each other. It contributes toward continually increasing among ourselves a level of trust based on *competence* (we can do what we are charged to do), *commitment* (we will do what is expected), and *sincerity* (we want to live up to these expectations because we care about program participants, customers and communities served by PHASE).

Should you have any questions, or require interpretation regarding any of the statements or procedures for raising an ethical issue, you may contact your director supervisor, any Administration Team member, or the Human Resources Director.

PHASE LEADERSHIP PHILOSOPHY

It is the belief of PHASE that its service quality rests on the quality of relationships within the organization. While many more components go into creating an excellent service, the quality and integrity of human relationships form the foundation upon which all other components are built. And, because the “PHASE Service” itself is one that is defined by relationships, the PHASE leadership philosophy is rooted in the critical importance of *tending to relationships* in all that we do.

Further, PHASE believes all members of the organization are leaders, and that through the co-creation of a large-minded, competent, effective and dynamic culture, the relationship between PHASE Team Member and PHASE Program Participant will be genuine, therapeutic, flexible, and defined by the true desires and goals of the Program Participant. This acts as the prime strategy, and the fundamental organizational underpinnings, to do the work of realizing the PHASE Mission and Vision. Simply stated, PHASE has the great ethical responsibility to recognize, foster and support the relationship between the healthful state of the PHASE leader and the enhanced quality of interaction and service between that leader and the PHASE Participant.

PHASE Leadership Values

- **Program Participant First** – Considering openly how all processes, actions and decisions will affect program participants. Every decision must benefit program participants.
- **Ethical Integrity** - Acting at all times with only the highest of ethical integrity and scruples.
- **Large Minded**– Choosing an Empowered State, Seeing Possibilities, Creating Solutions.
- **Empowerment** – Committing in action to individual and team development, recognizing competence, and reinforcing excellence.
- **Innovation** – Committing to new ideas and creative solutions.
- **Excellence** – Promoting best practices, accountability and efficiency.
- **Service for Social Good** – Committing to improve society through service.
- **Fun at Work** – Promoting an enjoyable and fun workplace in the course of serving others.

BOARD'S RESPONSIBILITIES TO PHASE AND STAKEHOLDER COMMUNITIES

The following are expectations of behaviors of PHASE Board Members to PHASE as an organization, and to the Communities of PHASE Stakeholders:

- The Board ensures that PHASE continuously focuses on and accomplishes the Mission of the Organization.
- The Board formulates and monitors organizational Policies, consistent with only the highest of ethical integrity.
- The Board is responsible for the long-term vision and strategic planning of the organization.
- The Board listens to and reacts to the needs and opportunities of Stakeholder Communities.
- The Board hires and maintains a competent Chief Executive Officer to carry out the Mission and Vision of PHASE.
- The Board makes effective and efficient decisions based on sufficient and appropriate data.
- The Board maintains fiduciary oversight of the Organization.
- The Board identifies in its governance potential conflicts of interest, and works to minimize those conflicts.
- The Board acts as the "Ethical" owners of the Organization.

PHASE TEAM MEMBERS' RESPONSIBILITIES TO PROGRAM PARTICIPANTS

All PHASE Team Members have the responsibility to PHASE, and on behalf of Program Participants, to act and interact according to a set of ethical standards. The following is the summary of these ethical standards:

- PHASE Team Members are accountable for: 1) managing one's own state, intentions and acts to foster the most genuine and therapeutic environment for the Program Participant and, 2) working with the Program Participant in the most intentional, creative and competent manner to help the Program Participant realize their goals, independence, pride and community inclusion.
- PHASE Team Members treat Program Participants with respect, honesty, equality and dignity, promoting their interests and informed choices.
- PHASE Team Members represent PHASE and Program Participants through the modeling of healthy behaviors, honesty and good citizenship.
- PHASE Team Members educate the community about the PHASE programs: enhancing public awareness of individuals with disabilities/special needs, educating the public on the capabilities of individuals served, protecting the privacy rights of persons served, and holding in confidence all personally identifiable information obtained in the course of professional service.
- PHASE Team Members honor their position as a potential role model for those served, and strive to set a healthy personal and social example.
- PHASE as a whole provides value-based and valuable services to the full community. The job of PHASE is to facilitate a service in which Program Participants may LIVE, WORK AND THRIVE in their CHOSEN COMMUNITIES.

PHASE TEAM MEMBERS' RESPONSIBILITIES TO ONE ANOTHER AND PHASE

PHASE Team Members, at and across all levels, share a core responsibility to interact and work with each other in a manner that, ultimately, supports the Mission of the Organization. In addition to the philosophy and expectations outlined earlier in the Code of Ethics, the following supplement the ethical basis upon which PHASE operates:

- All members of the PHASE Team (i.e., all employees, volunteers, etc.) strive to understand and do what is necessary to fulfill the Mission of the Organization.
- PHASE Team Members demonstrate understanding and respect for the roles and responsibilities of other Team Members.
- Communication between PHASE Team Members is effective, direct, respectful, honest, reflected in actions.
- PHASE Team Members strive to attain and maintain positive and hopeful behaviors: not only identifying issues with others or within the Organization, but also offering to help by providing collaborative and creative solutions whenever appropriate and possible.
- PHASE Team Members exhibit an attitude and commitment to strive to continually improve their performance.
- PHASE Team Members know and meet the expectations of respective jobs, maintaining a stance of accountability for job responsibilities and expectations.
- PHASE Team Leaders shall resolve issues fairly and consistently. Job expectations, responsibilities, appropriate boundaries, and code of conduct shall be clearly stated.
- PHASE Team Leaders establish a climate of effective action through effective communication, marked by the demonstration of successfully fulfilling the *Effective Communication Cycle*.
- PHASE Team Leaders embrace problems, issues and conflict as a source for creative solutions and innovation through effective leadership.
- PHASE Team Members assist each other during times of high-demand, and support on another in difficult situations. They work as a "Team", pitching in even in unpleasant situations, taking the lead, and not waiting for others.
- PHASE Team Members act with the highest level of ethical integrity, actively identifying where gaps exist, and working collaboratively to directly resolve conflicts, underperformance, and lapses in service.
- PHASE Team Members respectfully hold one another accountable in the respectful and integrity-based service to Program Participants and in the path toward realizing the Mission of PHASE.

CONFLICT OF INTEREST

PHASE recognizes and respects each Team Member's right to engage in activities outside his/her employment, which are private in nature and do not in any way conflict with, or reflect poorly on PHASE. However, as employees and Board Members of PHASE, we must avoid situations where a conflict of interest might occur, or appear to occur. Below are situations that could constitute a conflict of interest:

- Using one's position in the organization or knowledge of its affairs for outside personal gains.
- Outside employment – the act of engaging in any business outside of PHASE is a conflict of interest if it interferes with your performance or responsibilities to PHASE. PHASE prohibits any Team Member from accepting simultaneous employment with a PHASE supplier, customer, or a business supporting a person receiving PHASE services without approval from PHASE.
- Business Interests – investing in the business interests of customers, suppliers and competitors may be a conflict of interest. You must first take great care to ensure that these investments do not compromise your responsibilities to PHASE.
- Related Parties – It may be a conflict of interest to conduct PHASE business with a family member or with a business in which a family member is associated in any significant role. If such a transaction is unavoidable, you must obtain prior approval from the Human Resources Director. Any dealings with a related party should be conducted in such a way that no preferential treatment is given to this business that would not otherwise be given to another business. In a similar way, conducting business with family members of persons receiving services may be considered a conflict of interest and should first be discussed with and approved by Human Resources.
- Borrowing from, or loaning money/gifts/gratuities to program participants.
- Directorships – It may be a conflict of interest to serve as a director of a business in competition with PHASE. You must inform Human Resources before accepting a directorship with a competitor of PHASE.
- Dual Relationships – It may be a conflict of interest to engage in a dual relationship with a program participant of PHASE, such as engaging in an intimate or personal relationship, acting as a guardian, representative payee, or any other role in which you dually represent the program participant, etc. PHASE prohibits nearly all instances of dual relationships between a PHASE Team Member and a PHASE Program Participant. Team Members must disclose to Human Resources any identified dual relationship, or the intent to engage in a dual relationship.
- Personal Fundraising – While personal fundraising may not necessarily represent a direct conflict of interest, PHASE prohibits any personal fundraising activities directed at Program Participants, and any other "non-PHASE" fundraising activities without the express permission of the Executive Director.

While it is not always possible to avoid a conflict of interest, PHASE strives to adhere to the highest of ethical standards, and actively works to avoid circumstances that constitute, or are perceived as, a conflict of interest. Should any Team Member identify, or intend to engage in an activity that may be a conflict of interest, it is the requirement of that Team Member to disclose it to Human Resources immediately.

REPRESENTING PHASE SERVICES AND PROGRAM PARTICIPANTS

Accurate and ethical representation of PHASE services is critical to success and integrity in the community. PHASE Team Members represent PHASE at all times during the workday, and hold the responsibility to represent PHASE positively, fairly and with professional conduct. It is also the expectation that program participants of PHASE be represented in the most respectful and ethical manner at all times.

PHASE uses many formal methods and avenues to represent its services, such as newsletters, press releases, brochures, website(s), and multi-media advertising. It is vital to represent accurately and consistently to the public what PHASE does, and the population PHASE serves. Any and all depictions, representations and

advertisements of PHASE must have prior approval by the Executive Director. Additionally, all inquires or calls from the press or other outside agency must be forwarded to the Executive Director.

PROTECTING PHASE CONFIDENTIAL INFORMATION

Protecting PHASE and program participant confidential information is critical to organizational integrity, and respecting the rights of program participants. Some examples of confidential information includes: any information that could reasonably identify a program participant to any party for which there is not an expressed written release of information (or a limited number of other situation allowed by law), lists of persons receiving services or their families, lists of customers, and information about other Team Members. Each Team Member is responsible for assuring that this information is not disclosed, intentionally or unintentionally.

All information regarding program participants must be treated as confidential. PHASE Team Members must follow PHASE policies regarding confidentiality and the release of information. Additionally, PHASE maintains a Privacy Rights Statement with regard to Protected Health Information. This includes using the names or other personal information about PHASE program participants on personal social networking sites, public airwaves, or other personal digital media.

BUSINESS AND FINANCIAL PRACTICES

The Organization's business and financial practices will be conducted in accordance with recognized ethical business practices. All revenues collected, and expenses paid by, PHASE will be accounted for, and regular financial reports will be developed, maintained and reviewed by the organization's CFO, CEO and Board of Directors. Additionally, an independent financial auditor annually reviews the organizations statements of financial activities in accordance with GAAP, and report findings to the Board of Directors.

All policies and procedures that direct the financial and business practices of the organization will be in writing, reviewed on a regular basis and adhered to consistently.

The CEO will develop and regularly submit to the Board of Directors accurate, true and timely reports which detail business and financial operating activities, and financial position of the organization.

COMMITMENT TO CORPORATE COMPLIANCE

PHASE is committed to compliance with all applicable laws and regulations, federal, state or local including the Federal Deficit Reduction Act, False Claims Act, and other laws designed to detect fraud, waste and abuse in the public health care programs. Team Members are to exercise common sense, sound judgment and personal integrity in the performance of their duties. PHASE is committed to the development and implementation of comprehensive policies and procedures and other corporate compliance measures to provide regular monitoring and conformance with all legal and regulatory requirements.

PHASE has established a culture that promotes the prevention, detection and resolution of instances of misconduct, including potential violations of federal, state and local laws and requirements, as well as the organization's ethical business practices. PHASE encourages an atmosphere that protects Team Member's confidentiality and has procedures in which Team Members can report matters on an anonymous basis.

Team Members are expected to report information accurately, truthfully and completely. This includes reporting time worked, business expenses incurred, production data, billing information, and all other business related activities. Team Members are prohibited from making false or improper entries on any document that affects PHASE or its funding sources or customers. In the course of PHASE reporting to governmental and regulatory agencies its cost reports or claims, it is critical that the records, reports and

submissions be accurate and reliable. Team Members are responsible for providing full and correct information whenever completing reports.

PHASE Team Members shall refrain from conduct which may violate fraud and abuse laws. Examples of misconduct include, but are not limited to: payments in exchange for the referral of participants, submission of false, fraudulent or misleading claims to any government agency, making false representations to any person or entity in order to gain or retain participation in a program or to obtain payments or excessive payments for any service, and engaging in activities intended to defraud anyone of money, property or honest services.

PHASE is committed to insuring an environment where which reports of suspected violations of the law, company policy or fraud can be reported in a manner in which the reporting party is free from retaliation (i.e., “no-reprisal”) from the organization in any manner. Each Team Member has the responsibility to report any wrongdoing, and is encouraged to inform their direct supervisor as a first option for reporting, unless the direct supervisor is directly involved in the misconduct. In this case, Team Members follow the chain of command. Additionally, the community at large is encouraged to report wrongdoing on matters involving PHASE. This information is available by request and published on the organization’s website.

All complaints shall be addressed and investigated, and a response provided to the individual lodging the complaint. The organization shall work to complete the complaint investigation, including providing a direct response to the individual lodging the complaint, within fifteen (15) business days. Team Members bringing such reports in good faith shall not be subject to retaliation or adverse action based on the disclosure of the complaint. The Human Resources Director shall maintain a record of all such complaints, along with the investigative outcomes. Confidentiality, to the extent possible, and that which is provided by law, shall be maintained.

Any employee found to have violated an applicable policy or provision of the Code of Ethics will be subject to disciplinary action, up to and including termination from PHASE. Violations of applicable laws and regulations may be referred for criminal prosecution, as well as possible institution of civil action to reimburse PHASE for any losses or damages. If you are unsure about the appropriateness of an event or action, seek guidance from your immediate supervisor, any Administration Team member, or Human Resources.

CONCLUSION

The PHASE Code of Ethics is intended to act as both a guide and a compass for individual and collective integrity in the course of business and service to others. While not every circumstance or policy is outlined in this guide, it acts as the blueprint for the attainment of the highest possible level of ethics and integrity to fulfill the PHASE Mission. Should you have any questions, concerns, or additional ideas involving the PHASE Code of Ethics, please feel free to discuss this with your direct supervisor, Human Resources, or any member of the Administration Team.

*Other PHASE Documents, Policies and Procedures supplementing the Code of Ethics include the PHASE Anti-Fraud Policy, PHASE Corporate Compliance Plan, and PHASE Employee Handbook. For additional copies of these documents, please make the request directly to the PHASE Human Resources Office.

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