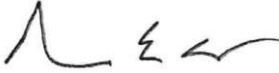


River Hospital
4 Fuller Street
Alexandria Bay, NY 13607

Subject: Code of Conduct	Approvals:
Department: Compliance/Privacy	BOT Approved: 6/28/2024, 4/23/2025  Norm Snyder, Chairman of the Board
Effective Date: 06/2023	 Corporate Compliance & Privacy Officer, Kimberly Leonard, MHA, CPC, CPMA, CPPM, CDEO, CHC
Distribution: All	
Revised: 4/2025	Reviewed: 12/2023

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Policy Statement:

This policy applies to River Hospital Inc., and its subsidiaries (collectively “RIVER HOSPITAL”) and the employees, CEO, senior administrators, independent contractors, managers, and governing body of such entities as well as those acting for or on behalf of such entities (collectively, “Affected Individuals”).

All Affected Individuals and other representatives have an obligation to observe and follow River Hospital’s policies and procedures and abide by the Code of Conduct. All Individuals are to support River Hospital’s vision, mission, and values in a respectful, responsible, and ethical manner and refuse to participate in unethical or illegal conduct.

1. Compliance with Laws, Regulations, and Contracts

Affected Individuals must be committed to conducting themselves in compliance with applicable laws, regulations, and contractual obligations. If there is any doubt as to whether an activity is legal or proper, the individual should contact the Corporate Compliance & Privacy Officer.

2. Professional Ethics and Integrity

All Affected Individuals are expected to uphold the highest standards of professionalism, respect, and courtesy in all interactions with patients, families, colleagues, and community partners. Harassment, retaliation or any other form of inappropriate behavior is strictly prohibited. Individuals are expected to maintain boundaries and conduct themselves with integrity in all professional relationships and demonstrate ethical judgment in all business operations involving patients or stakeholders.

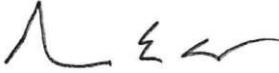
3. Confidentiality

Affected Individuals will protect all confidential information received in a manner consistent with applicable legal and ethical standards. Individuals and Entities will comply with applicable federal and state laws protecting the privacy and security of protected health information and other sensitive information.

4. Billing and Payments

All Individuals are to maintain accurate, truthful, and complete records, including financial reports, time sheets and other documentation. Records must clearly reflect the nature of transactions and comply with applicable laws and regulations.

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5. Record Documentation

All Affected Individuals shall ensure timely, complete, and truthful; reflecting detailed information about encounters made with patients. All billing must be based on documentation of services provided and medical necessity. Any errors, discrepancies, or suspected improper billing practices must be reported immediately to the Corporate Compliance & Privacy Officer.

6. Conflicts of Interest

A conflict of interest occurs when an individual's personal, financial, or professional interests interfere with their responsibility to act in the best interest of River Hospital. All Individuals must disclose any actual or potential conflicts and avoid situations where their judgement or decision making could be influenced.

7. Gifts and Gratuities

Individuals are not allowed to accept gifts, favors, other items of value that could influence decision-making or create the appearance of conflict-of-interest. Individuals may not accept gifts that are intended to gain favorable treatment or compromise their judgment. Any offers of gifts must be reported to the Corporate Compliance & Privacy Officer.

8. Training and Education

All Affected Individuals are required to participate in regular training and education programs to ensure understanding of the Code of Conduct and Compliance Program and applicable laws and regulations.

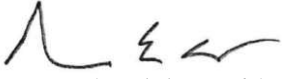
9. Reporting Possible Violations

All Individuals are encouraged to report any known or suspected violations of the Code of Conduct, Compliance Program, policies or applicable laws to the Corporate Compliance & Privacy Officer which may include concerns about fraud, waste abuse, falsification of records, or other misconduct. Reporting can be done confidentially and without fear of retaliation or intimidation.

10. Non-Intimidation, Non-Retaliation

River Hospital is committed to investigating all compliance reports promptly and maintaining confidentiality to the extent of the law. There is a strict prohibition of intimidation and/or retaliation against anyone who in good faith participates in the Compliance Program or the reporting to appropriate

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officials as provided in *sections 740 and 741 of the NYS Labor Law*. Intimidating and/or retaliatory acts are themselves a violation of the Compliance Program and Code of Conduct and are, therefore, subject to disciplinary action up to and including termination and/or contract.

11. Disciplinary Action

All Affected Individuals are responsible to ensure that their behavior and activities are consistent with the Code of Conduct. Individuals will be subject to disciplinary action for violating the principles outlined in River Hospital's Code of Conduct, Compliance Program, their policies and procedures. Failure to comply may result in disciplinary action, including verbal or written warnings, suspension, or termination of their employment and/or contract with River Hospital.

References: *US Sentencing Guidelines Part 363-d Social Services Law; 18 NYCRR 521-1*