

I.G.2.a. CODE OF ETHICS, VALUES AND CONDUCT

I. Mission Statement.

Chimes Family of Services is a model of excellence with innovative, flexible, and responsive solutions that are customer focused and results oriented. Chimes, its affiliates, and related organizations are acknowledged as international leaders in providing services, supports and employment for people with disabilities. Basic to Chimes system of service is the active involvement for the people served, their families and advocates. Equally critical is a well trained, dedicated staff and responsive Boards of Directors who are committed to excellence in providing Chimes services. Fundamental to all of Chimes activities is the maintenance of the highest quality and integrity.

Chimes Family of Services organizations are as follows:

The Chimes, Inc., dba Chimes Maryland;
Chimes International Limited;
Chimes Metro, Inc., dba Chimes Delaware;
Chimes Virginia, Inc.;;
Chimes District of Columbia, Inc.;;
Holcomb Associates, Inc., dba Holcomb Behavioral Health Services;
Open Door, Inc.
Family Services Association, Inc.
Chimes Foundation, Incorporated; and
Chimes Israel.

Chimes International Limited

Chimes International Limited will lead, coordinate and support the efforts of each affiliate, individually and collectively, to adapt to constantly changing customer needs while maintaining high quality, cost effective services and supports in order to access all available professional, public and private resources and funding streams.

II. Philosophy and Guiding Principles.

The philosophy which guides Chimes is based on the belief that every person has the right to develop to his or her fullest potential. Chimes provides the skills and support to assist each person with disabilities toward achievement of his or her aspirations and goals. The Agency recognizes the uniqueness of each person and promotes feelings of human dignity,

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a sense of self worth and the right to make informed choices. Program and services are developed and provided for each person with special needs utilizing an interdisciplinary approach. Individualized supports and services are implemented in a manner, which is culturally normative, age appropriate, and which focuses on individual strengths, needs, abilities, interests and desires. To facilitate implementation, services are provided to each person in the most integrated setting that is available which is appropriate to his or her needs.

Chimes further believes that four concepts are guideposts to maximize the potential of each person receiving services to attain his or her fullest potential and enhance his or her quality of life.

These four concepts are:

- Self-worth and human dignity
- Normalization and informed choice
- Empowerment and autonomy
- Integration and inclusion

III. Core Values.

Values Statement

A statement of corporate values is an expression of the strongly held beliefs that provide common purpose to *every* employee of the company. Chimes values are a portrait of what is meaningful and important to us, providing a framework for cooperation and a standard for judging our growth and solidarity as a team. We at Chimes are committed to four core values:

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| Courage: | <ul style="list-style-type: none">• Innovative leadership and perseverance to accomplish a goal, regardless of insurmountable obstacles. |
| + | <ul style="list-style-type: none">• Calmness and confidence when dealing with difficult circumstances. |
| Accountability: | <ul style="list-style-type: none">• Communicating honestly and clearly.• Meeting expectations for organizational conduct. |
| + | <ul style="list-style-type: none">• Willingly acknowledge responsibility to others.• Accepting responsibility for one's actions and their implications. |
| Respect: | <ul style="list-style-type: none">• Demonstrating consideration for people including their needs and opinions. |
| + | <ul style="list-style-type: none">• Treating others with civility and courtesy.• Accepting personal differences, listening to what others have to say and refraining from ridiculing, embarrassing or hurting others. |

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- Excellence:
- Supporting a culture of performance and an opportunity to serve.
 - Meeting and exceeding our customers' requirements.
- +
- Enhancing the quality of life and providing employment and support for people with disabilities within the available resources.
 - Commitment to improving key results for our mission-related outcomes, productivity, operational performance, and financial results.
 - Assuring alignment directly or indirectly with our goals and objectives.
 - Assuring the needs and expectations of internal and external customers are continuously met.

= SUCCESS

In addition to corporate values, other values that serve as a foundation for the Code include:

Business Value Proposition, which defines the value we offer our customers.

Appropriate quality

Cost effectiveness

Long-term relationship

Trust

Personal Service

Collaboration

Creative approaches to respond to changing needs of the entity that is receiving services

Consistent record of performance

Responsiveness and flexibility

Timely

Adaptable

Employee Value Proposition for Direct Support Professionals, which defines the value we offer our front line workforce.

Chimes is a “people” company in every sense of the word. Chimes offers the opportunity to make a difference in the lives of people with disabilities and recognizes direct support professionals as essential partners who are key to our success.

What You Can Expect From Chimes:

- A challenging and stimulating work environment centered on meaningful work with timely open and honest communication.
- Learning opportunities to increase expertise and competency.

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- A reputation as a leader in the field.
- Development opportunities including leadership, mentoring, and individual coaching.
- Tuition reimbursement, a retirement plan, health and life insurance, and annual leave.
- 24/7 supports at your location when confronted with crises.

What Chimes Expects From You:

- Respect for the people supported and each other.
- Caring and compassionate nature.
- Accountability for your actions.
- Honesty and integrity in your daily interactions.
- Reliable and dependable work ethic.
- Willingness to exceed job expectations, learn new technologies, understand and support the mission, vision, values, and goals of the organization.

Employee Value Proposition for Credentialed, Senior and Support Staff, which defines the value we offer our workforce. Chimes is a “people” company in every sense of the word. Chimes offers the opportunity to make a positive impact on peoples’ lives and recognizes that a dedicated, highly qualified and diverse professional workforce is our edge.

What You Can Expect From Chimes:

- An industry leader that focuses on organizational excellence.
- A corporate culture that promotes opportunities for professional growth and development.
- Responsible leadership that provides clear direction and support.
- Challenging work that affords opportunities for creativity.
- Recognition and appreciation for the professional and technical expertise each individual contributes.
- Tuition reimbursement, a retirement plan, health and life insurance, and annual leave.

What Chimes Expects From You:

- Understand our business and apply one’s professional and technical expertise with dedication and enthusiasm.
- Demonstrate caring and compassion in all interactions with co-workers, employees, and persons supported.
- Lead by example and be accountable for your actions.
- Practice honesty, respect, and integrity in your daily interactions.
- Exceed job requirements with a focus on results, learn new technologies, and support the mission, vision, values, and goals of the organization.

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IV. Codes of Ethics

A. Service Delivery Code.

1. All members of Chimes Family of Services will assure that the basic rights of each person receiving services are protected including all statutory and constitutional rights.
2. Every person receiving services has:
 - a. The right to appropriate treatment and related services in a setting and condition that is supportive of the most integrated setting available to the person served.
 - b. The right to assert grievances with respect to infringement of guaranteed rights through the appropriate mechanisms including:
 1. Chimes Grievance Procedures
 2. Human Rights Advisory Standing Committee
 3. Advocates, if available
 4. Protection and Advocacy SystemGrievances to the Committee can be initiated by contacting any member of the Committee and that member shall bring the grievance to the attention of the Committee at the next meeting. If a person bringing a grievance requests that a Committee member be excluded from the meeting at which the grievance will be discussed, the Chairperson shall exclude that Committee member.
 - c. The right to be informed at the point of admission into a program, and at the annual individual plan meeting thereafter, of the Basic Rights, and the name, address, and telephone number of each Committee member. The person's guardian and family members having contact with the person shall also be informed of the person's rights, and the name, address and telephone number of each Committee member.
 - d. The right to an individual plan and the implementation of that plan.
 - e. The right to participate in all decision making.
 - f. The right to freedom from physical restraint, mechanical restraint, chemical restraint or time-out except in a situation which presents a danger to the person served or others.
 - g. The right to freedom from abuse and neglect.
 - h. The right to a humane treatment environment that affords reasonable protection from harm and appropriate privacy to persons served with regard to personal needs.
 - i. The right to be present and to participate in the review of his/her behavioral plan and/or other deliberations, which may affect his/her well-being.
 - j. The right to privacy, including reasonable access to a telephone, the right to receive visitors at reasonable hours and the right to send and receive mail unopened, including having access to writing instruments, stationery, and postage.

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- k. The right to confidentiality of and access to a person's records, unless access would be deemed detrimental to the person, in accordance with the appropriate federal, state and local laws and regulations.
- l. The right to have all information in an official record be accurate and complete.
- m. The right to receive legal representation at reasonable hours and to speak with that individual in an area where the communication cannot be seen or heard.
- n. The right to worship as the person chooses and the right to receive the clergy of his/her choice at all reasonable hours.
- o. The right to manage one's personal financial affairs in accordance with his/her ability as determined by the team, and the right to an accounting of all funds belonging to the person that are held or otherwise administered by the facility.
- p. The right to access a primary care practitioner of the person's choice at his/her expense.
- q. The right to possess and use his/her own clothing and other personal effects to a reasonable extent, and to have security for those effects.
- r. The right to share a room and/or visit privately with a significant other, if it is feasible to do so and not medically contraindicated.
- s. The right to leave the premises for personal activities with the level of supervision and assistance determined by the team based on community mobility skills, basic survival skills, medical contraindications and available resources.
- t. The right to be protected with regard to research activities.
- u. The right to be protected against having work assigned solely for the benefit of the facility without compensation.
- v. The right to exercise the rights described in this section without intimidation or reprisal (e.g., in the form of denial of any appropriate treatment).

The rights described in this section shall supplement but do not replace any statutory or constitutional rights. Such rights shall not be abridged without due process.

3. All members of the Chimes Family of Services will:
 - a. Maintain confidentiality of privileged information, verbal or written.
 - b. Promptly report all abuse, neglect or mistreatment of any person receiving services consistent with Agency regulatory requirements.
 - c. Implement an Individualized Education Plan/Individual Plan (e.g., CHOICE Plan, Personal Futures Plan) as assigned responsibility and will refrain from altering an Individualized Education/Individual Plan without authorization.
 - d. Refrain from engaging in or committing any false, fraudulent, misleading or harmful statement, action or omission involving a person served, another employee, the Agency, entities or individuals having a relationship with the Agency or any action disloyal to the Agency.
 - e. Refrain from removing property belonging to the Agency or persons served without prior authorization from the program director, department head or, as appropriate, the person served.
 - f. Treat and promote the treatment of people with disabilities with respect and

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dignity and work to remove barriers to full participation and inclusion in all communities.

4. No member of the Chimes Family of Services will:
 - a. Engage in any abusive behavior (including physical, verbal and sexual), neglect, or mistreat any person receiving services.
 - b. Engage in any sexual relations or other inappropriate intimate contact with people receiving services.
 - c. Engage in the misuse of funds, computer equipment or property of the person served or the Agency.

B. Human Resources Code - Staff Members.

1. All members of Chimes Family of Services will:
 - a. Assure that Chimes meets the needs of the persons receiving services.
 - b. Respect the value and dignity of all persons.
 - c. Strive to create and maintain a climate of loyalty, trust and mutual respect.
 - d. Support a work atmosphere in which the work of each person is respected as important.
 - e. Recognize excellent work done by other staff members and persons receiving services.
 - f. Strive to speak to everyone in a friendly, positive, enthusiastic and courteous way.
 - g. Support a work atmosphere that is open and non-secretive while being mindful of the need for confidentiality.
 - h. Support the decisions of management. Positions may be stated, but ultimately staff members must follow management's final decision.
 - i. Be loyal to Chimes. Refrain from doing anything that might bring discredit to Chimes.
 - j. Acknowledge that enthusiasm and a positive attitude always make for a better work place.
 - k. Uphold all applicable laws and regulations, going beyond the letter of the law to protect and enhance Chimes ability to meet its mission.
 - l. Be responsible stewards of Chimes resources.
 - m. Strive for personal and professional growth to improve effectiveness.
 - n. Carefully consider the public perception of personal and professional actions, and the effect those actions could have on Chimes reputation in the community and elsewhere.
 - o. Abide by all professional codes of ethics respective to their areas of expertise.
 - p. Remain abreast of current knowledge in professional area of expertise.
 - q. Promote the work of the organization and conduct business in a professional manner consistent with the values of the organization.
 - r. Refrain from reporting to work or Agency functions under the influence of alcohol or drugs. No member of Chimes Family of Services will engage in any activities related to the unlawful sale, manufacture, distribution, dispensation,

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- possession, purchase or use of alcohol or drugs.
- s. Fulfill job responsibilities in a professional manner and will:
 1. Promote the work and positive reputation of the organization and uphold all policies and procedures.
 2. Engage in courteous and polite behavior.
 3. Implement the policy and procedure for COIN and/or Acceptable Use of Network and Data Management.
 4. Follow safe work practices.
 2. No member of Chimes Family of Services will:
 - a. Engage in any acts of dishonesty including, but not limited to, theft, falsification of reports, billing documents, attendance records, time records, applications, resumes, or other significant documents.
 - b. Obtain employment on the basis of false or misleading information.
 - c. Engage in unprofessional or damaging actions in relation to persons within the Agency or community or negligent and inconsiderate treatment of persons served or employees.
 - d. Engage in rude, discourteous or uncivil behavior including, but not limited to, fighting.
 - e. Be affiliated with a vendor of a subsidiary or related organization or a client of such entity in violation of the Conflict of Interest Policy set forth below.
 - f. Have family members and/or friends at the work site during his/her shift without prior authorization from the supervisor.
 3. The following behaviors will not be tolerated:
 - a. Excessive phone calls, misuse of voice mail, Agency or personal cell phones, email, intra/Internet, printers, copiers and televisions for personal reasons.
 - b. Excessive tardiness or absence that had not been preauthorized or failure to notify supervisor in advance of absence.
 - c. Insubordination.
 - d. Use of profane or abusive language in the workplace.
 - e. Harassment of another employee of a sexual nature or otherwise including, but not limited to, verbal or physical conduct and/or contact or unwelcome advances.
 - f. Unauthorized absence from assigned work area during regularly scheduled work hours.
 - g. Sleeping or loitering while on duty; loitering on Agency property when not on duty.
 - h. Threatening bodily harm against other employees, persons served, members of management, visitors, or any actual act of violence, assault and/or battery committed against any of these named individuals.
 - i. Condoning, authorizing and/or participating in any inappropriate conduct committed on the employee's behalf by a family member, friend, or anyone else with whom the employee shares a personal relationship.
 - j. Carrying any weapon while on Agency business, job site, premises or property.
 - k. Theft, embezzlement, misappropriation or unauthorized possession or use of property belonging to the Agency, person served or employee.

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- l. Gambling, conducting games of chance or possession of gambling devices on the premises.
- m. Other serious misconduct.

Violation of the Code of Ethics, Values and Conduct is prohibited and may result in severe disciplinary action including immediate discharge and termination of employment.

C. Business Code - Board of Directors.

1. Members of the boards of the organizations associated with Chimes Family of Services will:
 - a. Strive to see that Chimes is operated in a manner that upholds Chimes integrity, adhere to its bylaws, and merit the trust and support of the general public.
 - b. Strive to adhere to all applicable laws and regulations, going beyond the letter of the law to protect and/or enhance Chimes ability to accomplish its mission.
 - c. Treat others with respect, doing for and to others as they would have done for and to themselves in similar circumstances.
 - d. Be responsible stewards of Chimes resources.
 - e. Take no actions that could benefit them personally at the expense of Chimes in violation of the Conflict of Interest Policy. Service on the Board of a Chimes entity is purely voluntary, and may not be used as a means for private inurement of Chimes profits.
 - f. Carefully consider the public perception of personal and professional actions, and the effect their actions could have, positively or negatively, on Chimes reputation in the community and elsewhere.
 - g. Strive for personal and professional growth to improve their effectiveness as a Chimes board member.
 - h. Refrain from unwarranted intrusion into the responsibilities of Chimes operational management.
 - i. Provide full disclosure in a timely manner on conflicts of interests as described by policy, procedure and law.
2. Financial Practices
 - a. All financial practices of Chimes shall be:
 1. Handled in accordance with the applicable federal, state and local laws.
 2. Conducted within the standards of commonly accepted, sound financial management practices.
 - b. All financial matters that fall within the purview of Chimes financial management policies shall comply with those policies.
 - c. All financial matters covered by Chimes bylaws shall be handled in accordance with the bylaws.

D. Marketing Code.

1. Marketing activities are part of Chimes accountability to the general public.

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2. Marketing activities and efforts shall always respect the dignity and privacy rights of those receiving services.
3. Marketing activities will never knowingly mislead or misinform the public or misrepresent Chimes.
4. Marketing activities will uphold the integrity of Chimes so as to merit the continued support and trust of the general public.

E. Professional Responsibility Code.

1. Community members must always be treated with respect and dignity.
2. Requests for information from community members are responded to in a timely manner.
3. Concerns or complaints from the community are addressed in a complete and timely manner.
4. Input is solicited from the community and is considered in a respectful manner.

F. Conflict of Interest Policy.

1. Service is Voluntary. Service on the Board of Directors of any Chimes organization is purely voluntary and shall not be used as a means for private inurement of Chimes resources or assets.
2. Vendor-Affiliated Directors, Officers and Staff Members.
 - a. "Vendor" is a person or organization which sells goods or services to a Chimes organization.
 - b. A person is "affiliated with" a Vendor if:
 1. he is an officer, director, employee or other member of the governing board of the Vendor;
 2. he has a material economic relationship (other than as an employee) with the Vendor; or
 3. he is a spouse, parent, sibling, child or member of the immediate household of the Vendor, or of a person described in "1" or "2" above.
 - c. No director, officer or staff member of a Chimes organization, who is a Vendor or who is affiliated with a Vendor to such organization, may vote on, or participate in the administration of, any contract between such Vendor and the Chimes organization or any other Chimes organization. Upon request by any other director, the person who is, or is affiliated with, a Vendor shall leave any meeting during discussion of a contract between a Chimes organization and such Vendor.
3. Client-Affiliated Directors, Officers and Staff Members.
 - a. A "Client" is a person or organization which receives goods or services from a Chimes organization, either as a recipient of program goods or services as part of the organization's charitable activities, or as a contract purchaser of goods or services from the organization.

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- b. A person is “affiliated with” a Client if:
 1. he is an officer, director, employee or other member of the governing board of the Client;
 2. he has a material economic relationship (other than as an employee) with the Client;
 3. he is a spouse, parent, sibling, child or member of the immediate household of the Client, or of a person described in “1” or “2” above; or
 4. he is the legal guardian of the Client.
- c. No director, officer or staff member of a Chimes organization who is a Client, or who is affiliated with a Client of such organization, may vote on, or participate in the administration of, any contract or other arrangement between such Client and the Chimes organization or any other Chimes organization. Upon request by any other director, the person who is, or is affiliated with, a Client shall leave any meeting during discussion of a contract or other arrangement between the Chimes organization and such Client.
4. Employees. No member of the staff of a Chimes organization shall, without previous approval of the President of such organization, be, or be affiliated with, either a Vendor to, or a Client of, the Chimes organization.
5. Relationships With Other Chimes Entities. Notwithstanding the foregoing, a person shall not be deemed “affiliated” with a Vendor or Client of a Chimes organization solely by reason of being a director or officer of another Chimes organization which is itself a Vendor or Client of another Chimes organization.
6. Reporting of Conflicts. Each director, officer and staff member of a Chimes organization must advise the President of such organization of any affiliation between such person and any existing or prospective Vendor to such organization, or any other Chimes organization, or Client of such organization or any other Chimes organization, in response to an annual questionnaire, and at any other time when the director, officer or staff member becomes aware of such an affiliation. For purposes of the section 6, a director, officer or staff member of a Chimes organization who has become, or prospectively anticipates becoming, a Vendor to or Client of such organization or to any other Chimes organization, shall be deemed to be affiliated with such Vendor or Client. If a director or officer of a Chimes organization is unsure about whether or not he is affiliated with a Vendor or Client, he must disclose all relevant facts to the Board of the Chimes organization, and must abide by the decision of the Board as to whether the affiliation exists. If a staff member of a Chimes organization is unsure about whether or not he is affiliated with a Vendor or Client, he must disclose all relevant facts to the President of the Chimes organization, and must abide by the decision of the President as to whether the affiliation exists.
7. General Discussion Not Prohibited. Nothing contained in this Policy shall prevent a director or officer of a Chimes organization who is or is affiliated with a Client of such organization from participating in discussions or decisions relating to the scope or quality of goods or services provided generally to such Client and other Clients similarly situated.

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8. Transactions with Disqualified Persons. In any transaction between a Chimes organization and a person who would be deemed a disqualified person under Section 4958 of the Internal Revenue Code, the Chimes organization shall seek to take advantage of the safe harbor provisions under applicable Treasury Regulations. Specifically, the Board of the Chimes organization will observe as closely as possible the following procedures in authorizing any such transaction:
 - a. The transaction will be approved only if its terms are reasonable, in the case of compensation arrangements, or at fair market value, in the case of transfer or use of property;
 - b. The transaction will be approved in advance by a body of directors who do not have any conflict of interest in regard to the transaction;
 - c. The approving body will obtain and rely upon appropriate data as to comparable transactions involving similarly situated organizations; and
 - d. At the time of approving the transaction, the approving body will document its basis for determining that the transaction is fair and reasonable.
9. Additional Requirements Only for Organizations Soliciting Charitable Funds in Pennsylvania. In addition to anything provided elsewhere in this Policy, in order to satisfy the requirements of the Pennsylvania Solicitation of Charitable Funds Act, a director, officer or staff member of a Chimes organization shall advise the President of such organization in response to an annual questionnaire and at any other time when such person becomes aware of such relationship which has not previously been disclosed, if such person is related by blood, marriage or adoption to any other member of the Board of Directors, or to any officer or employee of the Chimes organization or to any officer, agent or employee of any professional fund raising counsel or professional solicitor under contract with the Chimes organization, or to any supplier or vendor providing goods or services to the Chimes organization, and the names and business and residence addresses of any such related party.

V. **Reporting Violations of the Code of Ethics, Values and Conduct.**

Complaints or violations of the Code of Ethics, Values and Conduct are taken seriously, should be reported, and will be thoroughly and promptly investigated. Employees may file complaints by contacting the Chief Operating Officer, Supervisor, Department of Human Resource Management or Ethics.Point in accordance with the organization's policies and procedures. Ethics.Point is a resource that can be found on Chimes Online Information Network (Coin.Chimes.org) or on Chimes website. The Chief Compliance Officer oversees the investigation of each incident. Board Members or Vendors should report to the President or designee. Chimes forbids retaliation against anyone for reporting, assisting in making a complaint or cooperating in a harassment investigation. If a violation is found, disciplinary action and/or appropriate remedial action may result. Confidentiality will be protected to the extent possible, but cannot be guaranteed. All employees are responsible to help assure that violations to the Code of Ethics, Values and Conduct are avoided.