



Opioid Treatment Program Ethical Code of Conduct

PURPOSE

The purpose of this policy is to assure that Helio Health's Opioid Treatment Program (OTP) conducts business in a way that is in compliance with the highest ethical standards and that OTP employees exercise the utmost good faith in all transactions touching upon their duties to Helio Health.

SCOPE

This policy applies to all people and programs within Helio Health Opioid Treatment Program.

POLICY

All staff of the Opioid Treatment Program (OTP) are expected to act in an ethical manner and abide by all applicable laws and regulations.

PROCEDURE

Business: OTP staff must conduct business in good faith and in a manner that is not misleading or deceptive.

Marketing: The OTP is committed to marketing and promoting its services in a manner that is accurate and transparent. OTP staff must not engage in false, deceptive, or misleading advertising to the public or to the persons served by the OTP.

Contractual Relationships: The OTP is committed to engaging in fair and lawful contract negotiations and contractual relationships.

Conflicts of Interest: OTP staff must not use their positions, or knowledge gained therefrom, so that a conflict might arise between the OTP's interest and that of the individual. OTP staff should avoid, directly or indirectly, participating in any arrangement, agreement, investment, or other activity which could result in potential benefit at the expense of the OTP's interest. OTP staff must not accept any favor which might influence his or her official act or which might reflect upon his or her business conduct. OTP staff must avoid outside employment or activities that involve obligations which may compete with or be in conflict with the interests of the OTP. OTP staff must abide by Helio Health policies and procedures relating to conflicts of interest (ADM-13).

Social Media: OTP staff must not engage in social media with OTP patients on any social media activity site, and must seek supervision from a clinical supervisor if issues arise in this regard. OTP staff may not use the property of the OTP (including its computer and electronic equipment) for personal use while staff is required to be actively engaged in work activity for the OTP. No OTP staff member may post or discuss any aspect of a patient's treatment with Helio Health, or any aspect of an underlying diagnosis on any social media activity site. OTP staff may not use social media to post prohibited social media content which may include postings or commentary that may be defamatory, harassing, or a violation of the law. No OTP staff member may make a comment about another employee or patient that would be considered injurious to a reputation or good name. OTP staff must not post information that is considered proprietary to the OTP or which might be considered confidential information about the operation of the OTP. OTP staff must follow all requirements of the

Helio Health Social Media Policy (HR-08). The OTP may, in its discretion, review social media activity to the fullest extent permitted by applicable law.

Gifts: OTP staff must neither give nor accept gifts of significant value from patients. If presented with a gift that would fit the circumstances of the Helio Health Gift Acceptance and Fundraising Policy (ADM-09), OTP staff must follow the requirements of said policy.

Personal Fundraising: OTP staff may not solicit other employees during work time. Work time does not include authorized breaks or lunch periods. OTP staff may not distribute materials in work areas or on work time. OTP staff must follow the requirements of the Employee Handbook regarding solicitation, distribution and posting.

Personal Property of Persons Served: OTP staff must exercise respect for and safeguarding of the personal property of the persons served, visitors, and staff and property owned by the OTP.

Setting Boundaries: Should two OTP employees who work together or are in a supervisor/subordinate relationship enter into a close personal, non-work related relationship, one or both employees may have to be transferred. OTP staff are prohibited from engaging in close personal relationships with OTP patients.

Witnessing of Legal Documents: OTP employees may/may not witness the signing of powers of attorney, guardianship, and advance directives.

Professional Responsibilities: OTP employees are to provide professional services objectively and with integrity. OTP staff are to maintain the knowledge and skill necessary to provide professional services competently, and be fair and reasonable in all professional relationships. They are to disclose conflicts of interest, protect the confidentiality of all client information, and act in a manner that demonstrates exemplary professional conduct. Provide professional services diligently.

Human Resources: OTP staff must abide by the Employee Handbook and Human Resources policies.

Prohibition of Waste, Fraud, Abuse, and Other Wrongdoing: OTP staff must abide by all applicable laws aimed at deterring waste, fraud, abuse, and other wrongdoing, per the Employee Handbook.

VIOLATIONS OF ETHICAL CODES

The OTP fully complies with all applicable whistleblower protections and by Helio Health's non-intimidation and non-retaliation policies, per the Handbook.

Alleged violations of ethical codes will be investigated and resolved as soon as possible, but no later than 30 days after the initial report of an alleged violation.

EDUCATION OF STAKEHOLDERS

Copies of this Ethical Code of Conduct shall be posted on the OTP's website and in the OTP dispensing area.