



REACH Conflict of Interest / Code of Ethics

CODE OF ETHICS

Statement of Purpose

Members of the REACH organization including members of the Board of Directors (Board), its committees, REACH staff / contractors, consultants, vendors, volunteers and interns to the Organization are necessarily knowledgeable and active in the provision of health care services including but not limited to primary care, behavioral health care, Medication Assisted Treatment in the underserved regions of central and the southern-tier of New York. It is essential to the conduct of the business of the REACH that it maintains high standards of integrity and impartiality in its decision-making processes, and that these processes be free from actual conflicts of interest, and any appearances of conflict. No member of the REACH Board, its committees, REACH staff / contractors, consultants, vendors, volunteers and interns (herein referred to as "such persons") should have any direct or indirect interest, financial or otherwise, or engage in any business or transaction, or incur any obligation of any nature that conflicts with the proper discharge of that person's duties related to the REACH organization.

General Principles

- 1) This Code of Ethics and Conduct (the "Code") will apply to all members of the REACH organization. Each such person shall be responsible for knowing the contents of this Code. The Chief Executive Officer / Chief Medical Officer and/or Chair of the Board or their designee(s) will call the Code to the attention of all such persons each year. A copy of the Code will be provided to each new member of the REACH organization described herein as such persons to the organization upon the commencement of that person's duties.
- 2) No such person may accept employment or engage in any business or professional activity which would impair that person's independence of judgment in the exercise of his or her official duties.
- 3) No such person may accept employment or engage in any business or professional activity which would require that person to disclose confidential information which that person has gained by his or her role with the Organization.
- 4) No such person may disclose confidential information acquired in the course of that person's duties with the REACH organization nor use such information to further his or her own personal interest.
- 5) No such person may use or attempt to use his or her position with REACH to secure unwarranted privileges or exemptions for himself or herself or others.
- 6) No such person may engage in any transaction as a representative of REACH with any entity in which that person has a direct or indirect financial interest that might reasonably tend to conflict with the proper discharge of that person's REACH duties.
- 7) No such person may, by their conduct, give reasonable basis for the impression that any person can improperly influence such person (s), or unduly enjoy his or her favor in the performance of their official duties. Nor may any such person give reasonable basis for the impression that he or she is affected by the kinship, rank, position or influence of any party or person.



- 8) No such person may make any personal investment in enterprises which that person has reason to believe may be directly involved in decisions to be made by that person, or which would otherwise create substantial conflict between that person's REACH duties and that person's private interests.
- 9) Such persons will endeavor to pursue a course of conduct which would not raise suspicion among the public that such a person is likely to be engaged in acts that are in violation of the public trust.

Affiliation

- 1) Each such person of the REACH organization must file within thirty (30) days of taking office or employment and "Affiliation Statement" on a form provided by REACH (attached) cover the individuals with all organizations eligible for REACH support. Each such person will have the responsibility of keeping that Statement current by the timely filing or amendments thereto. All such Statements will be subject to the public inspection.
- 2) Each such person will be considered to be "affiliated" with an organization or individual for REACH support if they are related to REACH as:
 - a. Director, officer, trustee, or employee.
 - b. Fund raiser or public relations officer.
 - c. Independent contractor who has received fees or payments in the year preceding the filing of the Affiliation Statement or any amendment thereto.
 - d. Holder of financial advisor policy making role.
 - e. Direct or indirect financial beneficiary of a REACH contract with such an organization.
 - f. Having relationships including but not limited to familial (e.g., sibling, cousin, etc., by marriage, etc.), financial and / or business relationship.
- 3) In the event of "affiliation" with an applicant, such a person.
 - a. Will be forbidden access to any confidential information developed or obtained by REACH concerning the applicant.
 - b. Will not participate in any aspect of the decision-making process in connection with any matter that involves that applicant directly or indirectly.
 - c. Will not supervise or be supervised by such a person.
- 4) Each such person will not attempt in any way to influence the votes, opinions and / or evaluations (performance, etc.) of fellow REACH organizational members on applications or any other matter involving applicants with which they are affiliated.

Participation in Activities Supported by REACH

Each such person that takes part in activities undertaken with support from REACH, but may not receive any remuneration out of REACH funds for their service in connection with such activity, unless the REACH Board knows the amount of remuneration prior to acting on the application of the organization involved. The propriety of receiving such remuneration will depend on the nature of the organization, the amount of service in relation to the total budget of the organization and/or project and other relevant factors.

Gifts, Entertainment and Favors



Each such person is forbidden from soliciting, accepting or agreeing to accept, any gift of money, goods, loans or services, or entering into or participating in any other arrangements for personal benefits which would improperly influence or have the appearance of improperly influencing them in their REACH related duties and responsibilities.

Agreement of Persons Involved

- 1) Each such person will be subject to these guidelines and procedures during their period of service to the Organization.
- 2) Each such person will also avoid any action, whether or not specifically prohibited, which might result in or create the appearance of : (a) using their REACH position for private gain: (b) giving preferential treatment to any person or organization: (c) impeding the operations of the Organization; (d) losing complete independence or impartiality: (e) circumventing the Organization's decision-making processes, or; (f) affecting adversely the confidence of the public in the integrity of the Organization.
- 3) Upon the approval of the REACH Board, persons may be exempted from particular provisions of this Code. Any such exemption and the grounds therefore will be noted in the minutes of the meeting of the Board at which it is granted.

Interpretation and Advice

- 1) The REACH CEO / CMO and/or the Chair of the Board or their designee (s) will provide information, interpretation, and advice with respect to this Code and its application.
- 2) Any person covered by this Code may seek the advice of the CEO / CMO and/or Chair of the Board or their designee at any time, with respect to actual or potential conflict of interest situations in which such person is or may be involved, or about which such person has knowledge or information.
- 3) Such persons are encouraged to seek advice, whenever necessary, about the application and interpretation of this Code, as noted above.

Whistleblower Policy

This Codes of Ethics and Conduct for REACH requires all such persons to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of REACH, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all such persons to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including



termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Agency prior to seeking resolution outside the Agency.

Reporting Violations

The Code addresses REACH's open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code to the REACH's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Agency's open-door policy, individuals should contact the REACH's Compliance Officer directly (eengland@reachmed.org).

Compliance Officer

REACH's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his/her discretion, shall advise the CEO / CMO and/or the Board finance committee.

Accounting and Auditing Matters

The finance committee of the Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the finance committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. Confidentiality violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Acknowledgement



Each REACH affiliated person or such persons will acknowledge that they have read and understand the Code by signing the Acknowledgement Statement contained within the Affiliation Statement, as referenced herein.

Affiliation Statement

As explained in the REACH Code of Ethics and Conduct:

1) Such persons with a REACH associated will be considered “affiliated” with an organization eligible for REACH support if they are related to the organization as:

- a) Director, officer, trustee, or employee.
- b) Fund raiser or public relations officer.
- c) Independent contractor who has received fees or payments in the year preceding the filing of the Affiliation Statement or any amendment thereto.
- d) Holder of a financial advisory or policy making role, or
- e) Direct or indirect financial beneficiary of a REACH contract with such an organization.

2) In the event of an “affiliation” with an applicant, such person:

- a) Will be forbidden access to any confidential information developed or obtained by REACH concerning that applicant.
 - b) Will not participate in any aspect of the decision-making process in connection with any matter that involves the applicants directly or indirectly, and
 - c) Will be required to leave the room before the initial presentation to any closed meeting of any matter relating to the application of that organization and will be forbidden from participation in any discussion or vote concerning the application at any open meeting.
- 3) Neither REACH Board members, committee members, staff members or consultants to REACH will attempt in any way to influence votes or opinions of fellow REACH Board members, committee members, staff members or consultants to REACH on applications for any other matter involving applicants with which they are affiliated.

CONFLICT OF INTEREST

To avoid any conflict of interest or the appearance of a conflict of interest which could tarnish the reputation, as well as undermine the public’s trust in REACH, REACH staff and any representatives including the Directors thereof, will:

- Avoid any activity or outside interest which conflicts or appears to conflict with the best interests of REACH, including involvement with a current or potential vendor, grantee, or other organization, unless disclosed to and not deemed to be inappropriate by the Board of Directors.



REACH MEDICAL

- Ensure that outside employment and other activities do not adversely affect the performance of staff duties or the achievement of the organization's mission.
- Ensure that travel and related expenses are incurred on a basis consistent with the REACH mission and not for personal gain or interests.
- Decline any gift, gratuity, or favor in the performance of duties except for gestures of appreciation, etc. that may include items of nominal value, and decline any food, transportation or lodging, or entertainment related to REACH business, services, etc.
- Refrain from influencing the selection of staff, consultants, volunteers, interns and / or vendors who are relatives or personal friends or affiliated with, employ, or employed by such person.
- Employees must disclose all known conflicts or potential conflicts of interest in any matter before the organization (including the Board of Directors (Board)) or any committee upon which they serve.
- Employees whose salaries and wages are covered in part or in full by federal funding must disclose any potential conflicts of interest to a Federal awarding agency or pass-through entity in writing and in accordance with the applicable Federal awarding agency policy.