

# **COMPLIANCE**

## **Hilton East's Commitment to Compliance**

Hilton East Assisted Living, LLC (“Hilton East”) is committed to upholding all federal and state laws, regulations, and ethical standards. To this end, Hilton East has adopted a Compliance Program to promote Hilton East’s compliance with all applicable federal and state laws, rules, regulations, policies, and standards, and ethical standards. Hilton East’s Compliance Program, Compliance Plan, Standards of Conduct, and associated policies and procedures provide guidance to all persons who are affected by Hilton East’s compliance risk areas, including Hilton East’s employees, contractors (including contractors, subcontractors, independent contractors, and agents), and governing body members on how to conduct themselves when working for Hilton East. The goals of Hilton East’s Compliance Program are to:

1. Prevent fraud, waste, abuse, and other improper or unethical conduct;
2. Detect any improper or unethical conduct at an early stage before it creates a substantial risk of liability for Hilton East; and
3. Respond swiftly to compliance problems through investigation, disciplinary, and corrective action.

To receive additional information on Hilton East’s Compliance Program, please contact Brandon Davis, Human Resources Director, at [bdavis@hiltoneast.com](mailto:bdavis@hiltoneast.com) or (585) 392-7171 ext. 226.

## **Hilton East's Standards of Conduct**

Hilton East recognizes that operating in an ethical and legal manner is not only an obligation of Hilton East, but is an obligation of each individual providing services on Hilton East’s behalf. Hilton East’s Standards of Conduct set forth the basic principles that guide Hilton East’s decisions and actions. All employees, contractors, and Board members of Hilton East are required to comply with Hilton East’s Standards of Conduct in carrying out their duties.

To receive additional information on Hilton East’s Standards of Conduct, please contact Brandon Davis, Human Resources Director, at [bdavis@hiltoneast.com](mailto:bdavis@hiltoneast.com) or (585) 392-7171 ext. 226.

## **Reporting Compliance Concerns**

If you believe that a compliance violation may have occurred, you should report the issue immediately using any of the following reporting methods:

1. Report to Hilton East’s Human Resources Director, Brandon Davis, by telephone at (585) 392-7171 ext. 226 or email at [bdavis@hiltoneast.com](mailto:bdavis@hiltoneast.com);
2. Report to Hilton East’s Human Resources Director, Brandon Davis, in writing by mail to Attn: Compliance Officer/Human Resources Director, Hilton East Assisted Living, LLC, 231 East Avenue, Hilton, New York 14468;

3. Report to a member of Hilton East's Compliance Committee;
4. Report to a Hilton East supervisor;
5. Report to Hilton East's chief executive; or
6. Report to a member of Hilton East's governing body.

Anonymous reports of compliance issues can be made using Hilton East's Compliance Hotline or by making a report in writing by mail to the Compliance Officer. All reports of potential compliance issues will be investigated thoroughly and in a timely manner.

Hilton East will ensure that the confidentiality of persons reporting compliance issues is maintained unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by the New York State Attorney General's Medicaid Fraud Control Unit, the New York State Office of the Medicaid Inspector General, or law enforcement, or disclosure is required during a legal proceeding. All persons reporting compliance issues will be protected from non-intimidation and non-retaliation pursuant to Hilton East's Non-Retaliation and Non-Intimidation Policy.

The above reporting methods may also be used to ask compliance-related questions and to communicate directly with Hilton East's Compliance Officer.