NEW COMMUNITY
VISION • DIGNITY • ACHIEVEMENT

Policy Title: Code of Ethics and Code of Ethical Business Conduct

Effective Date: October 23, 2026 **Supersedes: September 22, 2022**

The NCC's Code of Ethics and Code of Ethical Business Conduct is quite detailed. However, there are three values that capture its essence: Integrity, Good Faith and Excellence. To help preserve and promote these values, NCC has developed Rules of Conduct to serve as a guide and reference for expected employee behavior. Because the business climate is so dynamic and complex, it is difficult to cover everything in one document.

These Rules of Conduct are designed to serve as a guide to employees as to unacceptable behaviors. The following are examples of such behavior and are not meant to be exhaustive.

In addition to maintaining and enforcing this policy to protect the interests and safety of all employees and the organization, NCC complies with all applicable federal, state and local laws and regulations concerning employer/employee rights and obligations.

As in any organization, a code of conduct is necessary to establish and maintain a productive and respectful working atmosphere. Any employee conduct that interferes with the effective operation of the organization's business is strictly prohibited. The performance standards listed here, and others that may be established from time to time, are not all-inclusive. Rather, they are published to provide a general understanding of what the organization considers to be unacceptable conduct. These performance standards are merely examples of the types of misconduct for which employees may be disciplined or dismissed.

NCC retains the right to administer discipline in any manner it sees fit. NCC may impose disciplinary action in those instances where management decides such action is appropriate. Disciplinary actions include, but are not limited to, oral warnings, written warnings, suspension, and discharge. NCC retains the right to determine what discipline will be imposed in each individual situation. While there are some performance deficiencies that are likely to result in immediate termination of employment, in other cases New Community may elect to initiate other discipline measures. Decisions regarding which particular type or types of discipline will be used, how many steps of discipline there will be and how much time an employee should be given to correct the performance deficiency will be determined on a case-by-case basis. Violations of any of the following performance standards may result in disciplinary action and/or immediate discharge.

Examples of unacceptable behavior under this policy include, but are not limited to:

- Engaging in behavior that does not treat colleagues with respect, courtesy, honesty and fairness, and have proper regard for their interests, rights, safety and welfare;
- Violating NCC's Conflict of Interest Policy, which prohibits the actions or activities of an individual, the individual's spouse or domestic partner, and/or immediate family members involving: obtaining an improper personal gain or advantage although made on behalf of NCC, an adverse effect on NCC's interests, obtaining by a third party an improper gain or advantage at the detriment of NCC;
- The acceptance of gifts from a vendor or customer that is in cash and/or exceeds $250 in a calendar year;
- Soliciting for financial contributions or for any other cause during work time;
- Discourtesy or rudeness in dealing with fellow employees, residents, clients and students of New Community Corporation;
- Use of abusive, threatening or obscene language. Threatening telephone calls or written/typed messages including email and/or text messages;
- Statements made in jest, antics or any activity that can be perceived as intended to inflict, or that may potentially result in, physical harm or property damage;
- Making malicious, false and harmful statements about others, sabotaging another's work;
- Violating the confidentiality surrounding NCC's involvement or activities, including but not limited to clients, residents, employees, children, youth, vendors and/or any other confidential or proprietary information;
- Misrepresentation, either verbal or written, or falsification or careless completion of NCC documents, including but not limited to employment applications, work authorization, licenses, expense reports, and time records (including those of others);
- Submission of falsified or altered medical documentation;
- Harassment, discrimination or intimidation in any form, including physical, verbal or written communication;
- Making false statements concerning the organization;

- Falsifying Company records or reports, including one's time records or the time records of another employee;
- Poor work performance, failure to maintain proper standards or productivity or careless or inefficient performance of duties; neglecting job duties and responsibilities;
- Insubordination; failure or refusal to follow the written or oral instructions of a supervisor or manager;
- Unauthorized disclosure of business/resident/client confidential information;
- Unauthorized absence from the work area;
- Engaging in unauthorized personal business during work hours; using Company time and resources for personal gain unrelated to employment with NCC; theft of Company time;
- Excessive absenteeism or lateness, or failure to report absences from work or provide documentation in a timely manner in accordance with NCC requirements;
- A no call/no show;
- Deliberate or careless damage to NCC's or a colleague's property;