



## *Compliance Program*

Dear Four Seasons' Staff Member(s), Personnel, all Individuals, Managers, Members, Employees, Agents, Medical Staff, Physicians, Governing Body Members, Executives, and Independent Contractors working for or providing services at Four Seasons:

Four Seasons Nursing and Rehabilitation Center ("Four Seasons") is dedicated to conducting its business honestly and ethically wherever Four Seasons operates. In order to meet this commitment, Four Seasons has set forth in this Code of Conduct the principles and rules to be followed by all personnel who work with Four Seasons.

The purpose of this Code of Conduct is to inform all personnel and involved third parties that Four Seasons is fully dedicated to approaching all of its activities, including compliance with laws and regulations, in an ethical manner. This Code of Conduct will familiarize new personnel with the ethical standards that guide our business and business relationships in our highly regulated environment. For existing personnel, it will reaffirm our commitment to ethical behavior in all circumstances. Since everyone at Four Seasons has a personal stake in this important program, we strongly urge each of you to review this information thoroughly and refer to it or use it should a situation arise requiring you to exercise your judgment.

Compliance with laws, regulations and our policies requires the full commitment of all Four Seasons personnel. Each of us is personally and professionally responsible for understanding and adhering to this Code of Conduct and the supporting policies and procedures, including those areas covering your specific job responsibilities. The purpose of this Code of Conduct is to provide you with guidance on ethical and compliance issues. However, this Code of Conduct cannot cover every issue you may encounter.

If you have a question or encounter a situation which concerns you, you should ask for assistance through your department supervisor, the Administrator and/or the Compliance Officer.

- The Compliance Officer for the Nursing Home is, **Caroline Rich who can be reached at 718-927-6305**
- The Compliance Officer for the Adult Day Health Care Centers is, **Alan Saperstein who can be reached at: 718 688-8703**  
The Compliance Officer for the Certified Home Health Agency is, **Jonathan Friedman who can be reached at: 718-3075460.**
- or you may call the **Corporate Compliance Hotline** anonymously for all of the above programs at: **718-927-6348.**

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Chief Compliance Officer