

COMMITMENT TO COMPLIANCE

Swiss Village remains fully-committed to "daily operations in a constant state of Compliance", and in order to do so we have employed the services of the Peace Church Compliance Program to help us establish and monitor our compliance to policy in this regard. The Compliance Officer for Swiss Village and the Program as a whole is the Vice President for Compliance of Friends Services for the Aging. The Compliance and Ethics Program at Swiss Village will manage the compliance issues, laws and regulations, and guidelines that are relevant to a provider of senior services including Senior Living Communities that provide a wide range of healthcare services. This includes but is not limited to Medicare and Medicaid regulatory issues; guidelines from the Office of Inspector General, Internal Revenue Service, and the Office of Civil Rights of the Department of Health and Human Services, Occupational Safety and Health Administration; as well as other federal and state regulatory and business issues. The program shall foster a culture of compliance that promotes legal and ethical behavior in the workplace by creating processes that detect and prevent fraud, waste, abuse, and policy violations. The Swiss Village Code of Conduct is supported by our compliance policies and procedures and should be read and understood jointly with those policies and procedures.

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