

# Objectives for Business Ethics & Compliance Program

## PURPOSE:

Develop an effective program to address ethical and compliance actions in all business functions with Shepherd Center.

## POLICY:

The Board of Directors of Shepherd Center has delegated to the Chief Executive Officer of Shepherd Center the authority to develop and implement a program addressing ethical and compliant business practices. The Chief Executive Officer has appointed a Chief Compliance Officer to ensure the successful development and implementation of this program, to be entitled the "Business Ethics & Compliance Program."

## OBJECTIVE:

The following primary objectives are to be established and carried out through the *Business Ethics & Compliance Program*.

1. Provide explicit guidelines to all staff and authorized agents of Shepherd Center to follow in all business practices.
2. Endeavor to have all staff aware of their ethical and compliance responsibilities in all business-related activities.
3. Enhance staff's ability to put ethical and compliant business practices into daily use and support a culture of proper business conduct.
4. Monitor Shepherd Center's performance in all business relationships.
5. Maintain and enhance a high level of trust with the community that purchases Shepherd Center's services.
6. Provide a system for proper decision making in all business-related affairs.
7. Ensure staff have the ability and autonomy to report any questionable business activities.
8. Investigate promptly and thoroughly all allegations and complaints of improper business practices.