

Objectives for Ethics in Business Program  
POLICY: AC.ETH.01.04

Date: April 27, 1999

Responsible to: President/CEO, Chairman

**PURPOSE:**

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

**POLICY:**

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

**OBJECTIVE:**

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

1. Provide explicit guidelines to all staff and authorized agents of Shepherd Center and affiliates to follow in all business practices.
2. Endeavor to have all staff cognizant of their responsibility in all business-related activities.
3. Enhance staff's ability to put ethical business practice into daily use and support a culture of proper business conduct.
4. Monitor the corporate performance in all business relationship.
5. Enhance a high level of trust with the community that purchase Shepherd'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 activity.
8. Investigate promptly and thoroughly all allegations and complaints of improper business practices. In-house counsel will be notified immediately.