



CODE OF ETHICS AND BUSINESS CONDUCT



About Us

Asbury Place Kingsport, Asbury Place Maryville, and Steadman Hill Assisted Living are part of MFA Tennessee Holdings, LLC, a partnership between the McFarlin Group and Asbury Communities, Inc. McFarlin is a privately held investment firm with a combined 50 years of experience in senior living. Since its inception in 2008, McFarlin has acquired, developed, and managed properties in Florida, Georgia, Oklahoma, Tennessee, and Texas. Asbury Communities is a leading not-for-profit system of continuing care retirement communities, senior living communities, and related services that is approaching a century of service to seniors.

**AsburyPlaceKingsport.net | AsburyPlaceMaryville.net
SteadmanHillAssistedLiving.com**

KEY ETHICAL & BUSINESS CONDUCT COMMITMENTS

Maintain quality care and service

Helping others live their best life begins with a commitment to provide high quality care and service at all times.

Protect privacy and security

We are entrusted with health and personal information that must be maintained securely and only used according to all applicable laws and regulations.

Comply with laws, regulations, and professional standards

We work in a highly regulated health care sector. Everyone must be aware of our legal and ethical responsibilities, and strive each day to meet those standards.

Ensure accuracy in all financial practices

We commit to maintain the accuracy and integrity in all our financial practices, including the coding, billing, and reimbursement for all products and services. The submission of false or fraudulent claims is strictly prohibited.

Avoid conflicts of interest

Our commitment to integrity demands that we avoid situations in which we receive (or may receive) an inappropriate or unlawful personal benefit from our decisions or actions made in the context of our job and workplace.

Lead with grace

We must take steps to make everyone feel included and respected. We should understand the differences in human error, reckless behavior, and intentional misconduct—and respond appropriately to these different situations.



Facilitate open and truthful communication

In a complex health service and business environment, we understand that things may go wrong. Therefore, we are responsible for fostering an environment of transparency that supports open, honest and truthful communication. We are required to report any issues or concerns that come to our attention.

Prohibit retaliation

Any type of retaliation against anyone who, in good faith, reports a problem or concern is strictly prohibited. You may report problems or concerns to your supervisor, Human Resources representative, or the Compliance Hotline.

Address identified noncompliance

Beyond reporting, we are required to fix the problems and errors that are brought to our attention and ensure proper reporting to government agencies, when required.

KEY COMPONENTS OF OUR COMPLIANCE PROGRAM

Compliance Officer

The Compliance Officer is responsible for the day-to-day operation of the Compliance Program.

Compliance Committee

Executive leadership team responsible for ensuring effectiveness of the Compliance Program.

Associate Hotline (1-877-455-7827)

or via the web: [asbury.ethicspoint.com](https://www.asbury.ethicspoint.com)

- » All Compliance Hotline calls are answered by live operators who are not Asbury employees.
- » Callers to the Hotline may remain anonymous.
- » Confidentiality of callers who identify themselves will be protected to the extent possible or allowed by law.
- » Callers will be provided a report number so they can call back to receive or provide additional information.
- » Emergencies should not be reported to the Hotline. Emergencies should be immediately reported to a supervisor, manager, director, or human resources representative.



Whistleblower and non-retaliation

- » Associates are required to report any known workplace problems or concerns.
- » Disciplinary action or retaliation is prohibited against any associate who makes a report in good faith.
- » Good faith means that the person is telling the truth as they know it.

Policies and Procedures

Policies and Procedures will be readily available to associates and provide clear guidance on compliance matters.

Training and Education

All associates receive training on their role in maintaining compliance.