

Corporate Compliance Program

Code of Ethics – Employees

PURPOSE:

ACDS is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and disciplining employees who violate the Code, including employees who neglect to report a violation.

While the standards addressed in this Code of Ethics are intended to guide employees in the course of their day-to-day responsibilities, they do not replace any ACDS or program policies and procedures. There may be instances that are not specifically addressed by this Code of Ethics or existing policies and procedures. In such cases, employees must seek direction from their supervisor, other ACDS management staff or the Compliance Committee.

All employees must comply with this Code of Ethics.

This Code of Ethics was approved by the ACDS Board of Directors and is a formal statement of our commitment to the standards and rules of ethical conduct.

RIGHTS & OBLIGATIONS:

It is the policy of ACDS to observe all laws and regulations applicable to its programs and to conduct business with the highest degree of integrity. To accomplish this, all employees must obey the laws and regulations that govern their work and always act in the best interest of our consumers, their families and ACDS. Policies and procedures, the Compliance Program, and this Code of Ethics are developed to provide guidance in your day-to-day work. You must abide by the policies and procedures and the standards set by ACDS.

The following general principles cover a wide range of employee rights and obligations which, collectively, will create the ethical environment we expect of ourselves and for our consumers.

1. Ensuring proper and authorized use of ACDS and consumer assets.
2. Maintaining complete, accurate and timely records.
3. Avoiding conflicts of interest.
4. Ensuring cooperation with investigations and audits.

Corporate Compliance Program

Code of Ethics – Employees

Ensuring Proper and Authorized Use of ACDS and Consumer Assets

By efficiently using ACDS assets, we can reduce obstacles in the workplace and deliver our services more cost-effectively. Assets include such things as equipment, computers, electronic communication systems, supplies, and funds, as well as intangible items such as concepts, strategies, plans, data, intellectual property, and other business information.

Fiduciary Responsibilities

It is the policy of ACDS to ensure that agency and consumer assets are used solely for the benefit of ACDS and consumers, respectively. Use of ACDS and consumer assets for any unauthorized or improper purpose is strictly prohibited.

Maintaining Complete, Accurate and Timely Records

All of our regulators and contracting counterparties depend upon our information to make sound decisions. It is the policy of ACDS to record and report all agency, consumer and financial information fully, accurately, and honestly. It is against ACDS policy for any employee to cause any ACDS documentation to be inaccurate or misleading in any way or for any reason. Loss of data or incomplete or inaccurate records could lead to a challenge of the integrity of our programs and could negatively impact our reputation.

Avoiding Conflicts of Interest

Conflicts of interest may arise when outside interests, employment or affiliations influence or appear to influence our ACDS business decisions. It is the policy of ACDS to avoid any situation where a conflict of interest exists or might appear between personal interests and those of ACDS. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

Political Activities and Contributions

Because ACDS is a non-profit organization, it is prohibited from engaging in any political campaign activities and a “substantial” amount of lobbying. Employees must refrain from political campaign activities during business hours. Employees must not act as a representative of ACDS in any political campaign activity.

Corporate Compliance Program Code of Ethics – Employees

Ensuring Cooperation with Investigations and Audits

It is the policy of ACDS to cooperate with investigations and audits by federal and state governmental agencies, and to promptly respond to requests for information from such agencies. A request may be formally addressed to ACDS or an individual within ACDS. Employees must report any requests for information or cooperation with an investigation to the Compliance Committee immediately.

REPORTING:

All employees must report any actual or suspected violations of this Code of Ethics, any applicable law or regulation, or any ACDS policy or procedure to managers, directors or the hotline, as outlined below.

In general, actual or suspected violations should be reported, as follows:

1. To your immediate supervisor or manager, or any other member of management with whom you feel comfortable;
2. To the Compliance Committee at ACDS; or
3. To the Compliance Hotline, for confidential and/or anonymous reporting of actual or suspected violations of this Code of Ethics, any applicable law or regulation, or ACDS policy, procedure, or practice.

The Compliance Hotline number is (877) 778-5463.

INVESTIGATIONS:

All employees must cooperate fully and honestly in any investigation into a reported violation of this Code of Ethics, any applicable law or regulation, or ACDS policy, procedure, or practice.

Upon receiving report of alleged or suspected non-compliance, an appropriate investigation will be immediately undertaken.

All reports of known or suspected non-compliance will be tracked and investigated. Investigations will include an initial assessment of alleged facts, a review of available evidence to substantiate reported violations, and establishment of a plan for resolution and corrective action. Status of such investigations will, by necessity, be confidential.

Corporate Compliance Program Code of Ethics – Employees

ACCOUNTABILITY:

Any employee who violates or knowingly fails to report any violation of this Code of Ethics, the Corporate Compliance Program, any applicable law or regulation, or ACDS policy will be subject to appropriate disciplinary action, up to and including termination.

Any employee who commits or condones any form of false or malicious reporting will be subject to appropriate disciplinary action, up to and including termination.

Employees cannot exempt themselves from the consequences of their own misconduct by reporting violations or concerns, although self-reporting may be taken into account in determining the appropriate course of disciplinary action.

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Code of Ethics – Employees**

Acknowledgement Form

- I acknowledge that I have received read, and that I understand this Code of Ethics.
- I understand that I must comply with this Code of Ethics, the Compliance Program, and all laws, regulations, policies, procedures, and other guidance applicable to the responsibilities of my position.
- I agree to promptly report any issues, concerns, violations or suspected violations to my supervisor, other management staff, Director of Human Resources, Compliance Committee, or the Executive Director.
- I understand that my failure to report any concerns regarding possible violations of the law, regulations, Code of Ethics, or Compliance Program may result in disciplinary action, up to and including termination of employment with ACDS.
- I agree to attend required training, essential to my job responsibilities as well as necessary to stay current with respect to the ACDS Compliance Program.
- I agree to be alert to any situation that could violate the Code of Ethics, policies and procedures, guidelines, and/or federal and state laws and regulations.

By placing a checkmark in the boxes above I acknowledge that I have read and understand each statement.

Signature _____

Print Name _____

Title _____

Date _____