

**ADDUS HOMECARE  
CODE OF BUSINESS CONDUCT AND ETHICS**

Dear Addus Employees, Officers and Directors:

We encourage you to conduct yourself every day in a manner that helps us maintain an outstanding reputation and be a good corporate citizen in the communities we serve. Nevertheless, this written Code shall serve as a reference resource for employees, officers and directors to guide appropriate business conduct especially in situations where it may be difficult to determine the proper course of action. The Code of Business Conduct is not intended to be an all-inclusive guide to business conduct. Rather, additional guidance is available to employees, directors and officers in the Company's Employee Handbooks and Policy and Procedure Manuals.

Please keep in mind the following considerations when reading this Code of Business Conduct:

1. This Code shall be applied in both letter and in spirit.
2. This Code shall be considered together with any applicable federal and state laws and regulations, as well as any of applicable internal policies and procedures and contractual obligations.
3. This Code applies to all employees, officers and directors of Addus HomeCare and its subsidiaries regardless of title, position and/or rank within the organization.
4. Any individual inside the organization who has knowledge of or becomes aware of a potential violation of this Code, the Company's internal policies and procedures or applicable federal and/or state laws has a duty and responsibility to immediately report it. We will not tolerate any type of retaliation against any individual who in good faith reports a known or suspected violation and/or inappropriate and/or unethical business conduct.
5. Any employee, officer or director, regardless of title, position or rank who knowingly and willingly chooses not to comply with the Code, our internal policies and procedures, and/or applicable federal and state law, shall be disciplined including up to termination. In addition, violations may be subject to criminal and/or civil penalties by law enforcement or other governmental enforcement agencies.

We will take steps communicate the information contained in this Code, our internal policies and procedures and other federal and state law requirements through specific periodic training programs and providing other related information.

This Code contains additional standards of business conduct for our Chief Executive Officer, Chief Financial Officer, Controller and the principal accounting office. These can be found under the section "Supplemental Standards for Principal the Principal Executive Officer and Other Senior Financial Officers".

Your commitment to comply with and adhere to this Code is required.

If you have questions about this Code or an appropriate business action to take in a particular situation, please contact your immediate supervisor or the Compliance Officer or direction. This code may be modified from time to time to meet regulatory and other legal requirements.

## **REPORTING OF VIOLATIONS:**

If you know or suspect a possible violation of this Code of Business Conduct, the Company's policies and procedures and/or applicable federal or state laws, it is your duty, responsibility and obligation to report it to us. There several options available to you to make a report.

### **Supervisor:**

We encourage you to begin the reporting process by contacting your supervisor to make your report. Your supervisor will then contact the Compliance Officer to share your concerns with him or her.

### **Ethics Hotline:**

If for whatever reason you feel uncomfortable about communicating a concern to your supervisor, you can call the Compliance Hotline at (844) 809 - 9454, anytime, 24 hours a day, 7 days a week. The Compliance Hotline is handled by a third party. All relevant reports will be investigated by the Compliance Officer or referred to appropriate management personnel for resolution.

Any report made on the Compliance Hotline will not be traced and you may report anonymously. Anonymity will be preserved up to the limits of the law. You are always able to leave your name and number if you would like to be contacted to further discuss your report or to ask about the status of a report.

### **Ethics Website Reporting:**

Reports may be submitted on-line at <http://www.addus.ethicspoint.com> at any time. Concerns submitted through the website are forwarded directly to our Compliance Officer. All relevant reports will be investigated by the Compliance Officer or referred to appropriate management personnel for resolution.

Any report made on the website will not be traced and you may report anonymously. Anonymity will be preserved up to the limits of the law. You are always able to leave your name and number if you would like to be contacted further to discuss your report or to ask for the status of a report.

When making a good faith report of a known or suspected violation, regardless of the method that you use to make the report, it is important that you provide as much detail as possible, including names, dates, times, locations and the specific conduct in question. Only with sufficient specific information can we adequately investigate the reported action.

Any report or submission of information will be treated in a confidential manner to the reasonable extent permitted by or up to the limits of applicable federal and/or state law. Please note, however, that if we investigate the activities you have reported, it may be impossible for us to maintain this confidentiality as to the fact of the report or the information reported.

We reserve the right to take appropriate disciplinary action, including and up to termination, against all individuals whom knowingly and willingly make a false report or a report in bad faith for which the employee reasonably should have known was groundless.

If you believe that you have been subjected to any action that violates this policy, you may file a complaint with your supervisor, the Compliance Officer or the Human Resources contact specified below. If it is determined that you experience any improper employment action in violation of this policy, we will take corrective action.

## **INVESTIGATIONS AND ENFORCEMENT:**

Reports of known or suspected violations of the Code, the Company's internal policies and procedures and/or applicable federal or state law will be collected, reviewed and processed by the Compliance Officer, or his or her designee. The Compliance Officer may refer reports submitted, as he or she deems appropriate or as required under the directives of the Board of Directors to the Board or a designated Committee thereof. Any reports submitted that

involve our accounting, auditing, internal auditing controls, disclosure controls, billing and collection practices, potential violations of the Anti-Kickback Statute or False Claims Act, HIPAA Privacy or Security breaches, or other areas of corporate compliance shall be presented directly to the Board of Directors on a quarterly basis or unless immediate attention is warranted.

All reports of known or possible violations of the Code, the Company's internal policies and procedures and/or applicable federal or state law will be investigated. If the investigation is substantiated, or proven, we shall take appropriate disciplinary action, including sanctions, against the individual(s) involved including up to termination of employment.

Any executive officer or director believed to have participated in a known or suspected violation shall not be permitted to participate in any investigation, resolution or recommendation for disciplinary action or sanctions.

Violations of the Code or business activity that may constitute illegal conduct shall be addressed, which may include making a report to appropriate criminal and/or civil authorities for further action. In addition, we may, under certain circumstances, be required to disclose violations of the Code and/or federal or state law to our shareholders.

#### **WAIVERS:**

In certain extraordinary circumstances, a waiver of the provisions of the Code (other than matters required by law) may be granted. Contact the Compliance Officer if you believe special circumstances warrant a waiver of any provisions of the Code. Any waiver of the Code for a Senior Financial Officer (defined below), executive officer or director may be made only by the Board of Directors or a duly authorized committee thereof. To the extent required by law or applicable stock market rules, any such waiver for senior financial officers, executive officers or directors shall be disclosed publicly.

#### **COMPLIANCE WITH RULES AND REGULATIONS:**

It is our policy that business shall be conducted in accordance with all applicable federal and state laws and in a manner that reflects the high standards of the business ethics and integrity. We are engaged in a highly regulated business, and as such, the federal and state laws that apply to us are far-reaching and complex.

The following standards are intended to provide you with guidance and assist you in your commitment, duty and obligation to comply with all applicable federal and state laws, rules and regulations as well as the Company's internal policies and procedures. These standards are neither exclusive nor complete, and in order to comply with these laws, you should learn enough about the laws that affect your job function and position to identify potential issues, to know when and where to seek advice and to obtain proper guidance on the correct way to proceed.

Additional Company policies and procedures can be found in the Employee Handbook, on the intranet and other internal communications published from time-to-time.

For additional guidance, or if you have questions regarding the existence, interpretation or application of any federal or state law, rule or regulation arise, please contact your supervisor or the Compliance Officer.

#### **Anti-Trust Laws:**

All employees, officers and directors must comply with applicable anti-trust and similar laws that regulate competition where we operate. Examples of conduct prohibited by such laws include the following:

- Agreements to fix prices, bid rigging, and market allocation and collusion, including price sharing with competitors;
- Boycotts, certain exclusive dealing arrangements and price discrimination agreements; and

- Unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices.

In addition to disciplinary action under this Code, violations of Anti-Trust laws may subject the Company to substantial penalties and may lead to criminal and/or civil prosecution of employees violating these laws, including imprisonment.

Remember that any contact with a competitor is hazardous and could be illegal. Illegal agreements are often approved with evidence of “small talk”, “casual discussions” and/or “harmless” exchanges of business information. Avoid such discussions, whether they occur in a large, formal group or in a social setting following a trade association meeting. If a competitor raises such a topic or any matter that you believe might violate the Anti-Trust laws or Addus HomeCare policy, you must immediately and firmly decline to discuss it. You should then promptly notify our Compliance Officer of such an event.

### **Health Care Anti-Kickback Statute and Stark Self-Referral Laws:**

We expect our employees, officers and directors to refrain from any conduct that may violate federal and state laws governing patient/client referrals, health care financial relationships and participation in any federal or state health care benefit program such as Medicare, Medicaid, VA, Tri-Care and other state-funded agencies.

The federal Anti-Kickback Statute prohibits any person or entity from:

1. Offering, paying, soliciting or receiving in cash or kind, regardless if directly or indirectly; and
2. Inducing the referral of patients/clients covered by Medicare, Medicaid or any other federal or state health care program; and
3. The leasing, purchasing, ordering or arranging for or recommending the lease, purchase or order of any item, good, facility or service covered by these programs.

There are many similar state laws. These laws are broad and may apply to some of our activities or our relationships with patients/clients/customers or business partners.

Federal and State Stark laws also prohibit physician referrals to entities in which a physician, or the close relative of a physician, has a financial interest.

Knowing and willful violations of these federal and state laws shall result in disciplinary action, including sanction and up to termination, in addition to Company fines and individual criminal and/or civil prosecution and penalties, including imprisonment.

If you have any questions about the Anti-Kickback Statute or the Stark Self-Referral laws, please contact the Compliance Officer.

### **False Claims Act:**

We expect our employees, officers and directors to refrain from any conduct that may result in the submission of a false claim to any federal, state, governmental, commercial or private payor. In general false claims are claims submitted for services either not performed or for more services than were performed. Some examples of false claims include, but are not limited to:

- Submission of timesheet for time not worked, including short-time or exaggerating time worked;
- Direct care employees using an EVV device to clock-in and clock-out from a client’s home location and not performing the work;
- Not performing all of the tasks listed on the client’s plan of care during each visit;
- Asking a client, or client’s representative, to sign-off on timesheets prior to week being completed;

- Submitting timesheets or using IVR or EVV devices to bill for services performed while the client was hospitalized, in a nursing home, incarcerated or dead.
- Requesting another employee or supervisor to falsify a timesheet by documenting time worked but not-worked or exaggerating the amount of time worked and/or clients served.

Knowing and willful violations of this federal and state laws shall result in disciplinary action, including sanction and up to termination, in addition to Company monetary recoupment and fines and individual criminal and/or civil prosecution and penalties, including imprisonment.

If you have any questions about the False Claims Act, please contact the Compliance Officer.

### **Coding and Billing Compliance:**

We are committed to ensuring that our coding and billing practices comply with all applicable federal and state laws, regulations, guidelines and policies as well as contractual requirements.

You shall use due care to assure that patient/client records and reports are prepared and maintained accurately and honestly. All claims submitted to any government or private health care program, individual, department or agency shall be accurate and conform to all pertinent Federal and State laws and regulations. Claims shall accurately reflect services or products that were actually rendered, and you shall use due care to assure that claims are for medically necessary services and are supported by relevant documentation that supports the medical necessity for such services.

All billing errors, inaccuracies, recoupments or issues shall be immediately reported to your supervisor or to the Compliance Officer so that it may be promptly addressed.

### **HIPAA Privacy and Security:**

We are committed to maintaining the confidentiality of patient/client protected health information. You must comply with all applicable HIPAA provisions including those provisions that regulate the privacy, security and electronic transmission of health information. In addition, other state and federal laws also govern the collection, storage, dissemination, transfer, use, access to and confidentiality of personal information and patient health information. You must comply with all provisions of these laws including the privacy, security and electronic transmission of health and other personal information.

All employees, officers and directors, shall:

- Only access the minimum amount of patient/client protected health information necessary to perform their job function;
- Use and disclose protected health information only when permissible by law or with patient/client consent;
- Protect confidentiality by not discussing patient/client information with anyone without a legitimate need to know including other co-workers, other clients, family and friends or in public locations;
- Dispose of protected health information only by shredding or an approved receptacle;
- Using encrypted laptops and jump drives;
- Password protect smart phones, tablets and other electronic devices; and
- Not emailing patient/client protected health information outside of the company network unless it is encrypted; or
- Use patient/client protected health information for personal gain.

Knowing and willful violations of this federal and state laws shall result in disciplinary action, including sanction and up to termination, in addition to Company monetary recoupment and fines and individual criminal and/or civil prosecution and penalties, including imprisonment.

If you have any questions about the privacy laws, please contact the HIPAA Privacy Officer.

**Environmental Laws:**

It is our policy to comply with all applicable federal and state environmental laws, rules and regulations particularly with respect to disposal of medical waste. Our employees, officers and directors shall strive to utilize resources appropriately and efficiently and dispose of waste in accordance with applicable laws, rules and regulations.

Any person who knowingly and willingly violates these requirements or prohibitions of such laws, including stated conditions of approved permits, may be subject to criminal and/or civil fines and penalties.

**Discrimination Laws:**

We believe in the fair and equitable treatment of employees, consumers, payors and other persons who are critical to fulfilling our vision and goals. It is our policy to conduct business and hiring practices, including but not limited to, the recruitment, hiring, training, promotion, assignment, transfer, layoff, recall and termination of employees without regard to race, color, religion, gender, ethnic origin, sexual orientation, age or disability of such person or any other classification protected by federal and/or state law.

It is our policy to recruit, hire, train, promote, assign, transfer, layoff, recall and terminate employees based on their own ability, achievement, experience, conduct and other legitimate business reasons. In addition, we will not tolerate sexual harassment or other harassment based on race, religion, gender, age, national origin, sexual preference, disability or any other protected or personal characteristic.

Employees, officers and directors shall report any and all allegations of harassment or discrimination immediately to the Human Resources contact or the Compliance Officer. Reported allegations of harassment or discrimination will be investigated in accordance with applicable federal and state laws and the Company's internal policies and procedures. Employees, officers and directors are expected to seek advice from the Human Resources Department when confronted with business decisions or actions involving the risk or potential appearance of a violation of the laws.

**Insider Trading:**

The purchase or sale of our securities which are aware of material nonpublic information about us, or the disclosure of material nonpublic information to others who then trade in our securities, is prohibited by us and by the federal securities laws. Our Board of Directors has adopted an insider trading policy that applies to all officers, directors and other employees. Please refer to our Company's internal Insider Trading Policy.

Anyone who knowingly and willfully fails to comply with or purposefully violates our insider trading policy and/or federal securities laws may subject the Company to substantial penalties and may lead to criminal and/or civil prosecution of the individual(s) violating these laws, including imprisonment.

**Political Process:**

You shall comply with all laws, rules and regulations governing campaign finance and lobbying activities and shall not engage in any conduct that is intended to avoid the application of such laws to activities undertaken on our behalf. In addition, executive officers shall monitor compliance with lobbyist registration and disclosure requirements by all individuals who act on our behalf.

**CONFLICTS OF INTEREST:**

A "conflict of interest" occurs when an individual's private interests interfere in any way or even appears to interfere with our Company's interests as a whole. A conflict of interest situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest also arise when an employee, officer or director, or a member of his or her family, receives improper personal benefits as a result of his or her position with us.

In addition to the general need to prevent conflicts of interest, we are also subject to applicable federal and state laws and regulations strictly controlling contractual and other relationships with referral sources. Please refer to our Company's internal Conflict of Interest Policy.

You should not have any business, financial, civic or professional interests outside of the Company that in any way conflicts with your ability to perform your duties at Addus HomeCare with undivided loyalty, unless our Compliance Officer or Chief Executive Officer expressly consents to such interest.

In the case of a conflict of interest where the amount involved may exceed \$120,000, the conflict must be approved by the Audit Committee or another independent Committee of the Board of Directors in the event it is inappropriate for the Audit Committee to review such transaction if there is a conflict of interest. Such transactions will only be approved if they are in, or not inconsistent with, the best interest of the Company, as determined by the Audit Committee or such other Committee determined in good faith in its sole discretion. If you find that there is any such conflict that must be disclosed that has not previously been approved by the Audit Committee or such other Committee, then it is your duty and obligation to bring such conflict of interest to the attention of the Compliance Officer. Notwithstanding the foregoing, compulsory transactions will be ratified by the Compensation Committee. In addition, you must communicate to the Compliance Officer any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest.

The following is not intended to be an all-inclusive list but to serve as a guide as to the types of activities that might cause a conflict of interest:

**Outside Financial Interests:**

- Conducting business not on our behalf with any Addus HomeCare payor, consumer, contractor, referral source or agency, or any of their directors, officers or employees;
- Representation of us by a director, officer or employee in any transaction in which he or she, or a family member, or entity controlled by such person, has a substantial personal interest;
- Disclosure or use of confidential, special or inside information of ours or about us, particularly for personal profit or to the advantage of the director, officer or employee, or family member of such person; or
- Compensation with us as a director, officer or employee, regardless if direct or indirect, in the purchase, sale or ownership of property or services or business investment opportunities.

**Services for Competitors, Payors, Consumers and Suppliers:**

You may not perform work or render services for any competitor of ours or for any organization or individual with which we do business or which seeks to do business with us, outside of the normal course of your service or employment with us, without the approval of the Compliance Officer or our Board of Directors or a proper Committee thereof for executive officers, senior financial officers or directors. You may not be a director, officer or consultant of such organization or individual, nor permit your name to be used in any fashion that may indicate a business connection with such organization or individual without such aforementioned approval. This prohibition extends to benefits, loans, including loan guarantees, and other forms of compensation.

**Participation of Boards of Directors /Trustees:**

- In order to avoid any conflict of interest, or appearance thereof, that could arise from service by an employee of ours as a director of another organization, employees and officers must obtain approval from the Compliance Officer prior to serving as a member of the board of directors or trustees of any business, trade or community organization, and directors must provide notice to the Compliance Officer prior to serving as member of the board of directors or trustees of any business, trade or community organization.



- We retain the right to prohibit membership by officers or employees on any board of directors or trustees where such membership might conflict with our best interests.

### **Family Members, Controlled Entities and Close Personal Relationships:**

You shall not use personal influence to direct our business to an entity in which any family member or friend has an interest. You shall disclose to the Compliance Officer any interest held by any such person in any entity doing business with us, including interests held by their immediate family members, except for ownership of less than 1% of a public corporation. In addition, you are required to disclose any other arrangements or other dealings with such an entity. The employment of any member of your family or any friend by such entity must also be disclosed. It should be understood that such information shall not be regarded by its nature as an undue or special influence, but is to be disclosed to allow us to determine if any undue or special influence could appear to be involved and in deciding what action we should take to safeguard our interests and the best interests of our stockholders.

### **Investments:**

You shall not allow your personal investments to influence, or appear to influence, your independent judgment on behalf of the Company. You must disclose to the Compliance Officer if you or any family member owns any interest in any corporation or entity that directly or indirectly competes with the Company or any division or affiliate of the Company. Any holdings of less than 1% in a public corporation whose stock is regularly traded on a stock exchange need not be reported; however, interests held in excess of that amount or in any private entity by you or your immediate family must be so disclosed. If there is any doubt as to how an investment might be received, it shall be disclosed to the Compliance Officer.

### **Gifts:**

You shall not accept kickbacks, lavish gifts or gratuities, which may include entertainment or travel. You may accept items of nominal value, such as small promotional items bearing another company's name. You may not accept anything that might make it appear that your judgment would be compromised. In some situations, it would be impractical or harmful to refuse or return a gift. When this happens, the situation shall be discussed with the Compliance Officer.

Some business situations call for giving gifts. Our gifts must be legal, reasonable and approved by management. You may never pay bribes or provide any cash or cash equivalents to any person. You may not provide any gift prohibited by applicable federal or state law, Addus HomeCare or the recipient's organization. For example, the employees of many governmental entities around the world are prohibited from accepting gifts. If in doubt, check with management or the Compliance Officer first.

Special rules govern the giving of gifts to or receipt of gifts from referral sources. We are subject to laws and regulations strictly controlling contractual and other relationships with sources of referrals or recipients of referrals. Specific Company policies govern these practices and supersede the general policies regarding gifts noted above. Please contact your supervisor or the Compliance Officer for copies of such specific policies.

### **Entertainment:**

In general, you may accept entertainment that is reasonable in the context of business and that advances the Company's interests. For example, accompanying a business associate to a local cultural or sporting event, or to a business meal, would in most cases be acceptable. Entertainment that is lavish or frequent may appear to be influence one's judgment on our behalf. Accepting entertainment that may appear inappropriate should be discussed with management in advance of accepting such entertainment.

Special rules govern entertainment provided by or to referral sources. We are subject to laws and regulations strictly controlling contractual and other relationships with referral sources. Specific Company policies govern these practices and supersede the general policies regarding entertainment noted above. Please contact your supervisor or the Compliance Officer for copies of such specific policies.

**Travel:**

In general, employees, officers and directors may accept transportation and lodging provided by a third party, if the trip is for business and is approved in advance by the individual's supervisor.

Special rules govern travel provided by or to referral sources. We are subject to laws and regulations strictly controlling contractual and other relationships with referral sources. Specific Company policies govern these practices and supersede the general policies regarding travel noted above. Please contact your supervisor or the Compliance Officer for copies of each specific policies.

**CORPORATE OPPORTUNITIES:**

Employees, officers and directors owe a duty to us to advance our legitimate interests when the opportunity to do so arises. To the extent officers or employees learn of a business opportunity that is within our existing or proposed lines of business, they should inform their supervisor or the Board of Directors, as appropriate, of the business opportunity and refrain from personally pursuing the matter until such time as we decide to forego the business opportunity. To the extent a director is approached in his or her capacity as a director of the Company regarding a business opportunity that is within our existing or proposed lines of business, he or she should inform the Board of Directors. You are prohibited from:

- Taking for yourself or your family members opportunities related to our business;
- Using our property or information or your position for personal gain; or
- Competing with us for business opportunities

Certain activities, such as opportunities that come to a director in his or her individual capacity where the Company does not have an interest in the opportunity, opportunities that are not within the Company's lines of business or proposed future lines of business or transactions with a competitor that are not within the Company's lines of business or proposed future lines of business may not be a usurpation of a corporate opportunity. If you are unsure of whether a corporate opportunity needs to be reported, please discuss the matter with the Compliance Officer. In the case of directors, if the disinterested members of our Board of Directors determines that we will not pursue a related business opportunity, then a director may pursue such opportunity. Officers and employees should refer questions regarding the appropriate course of action to the Compliance Officer before taking any action.

**PROTECTION AND PROPER USE OF COMPANY ASSETS**

All employees, officers and directors shall strive to preserve and protect our assets and resources and to promote their efficient use. The standards set forth below are intended to guide employees, officers and directors by articulating our expectations as they relate to activities or behaviors that may affect our assets.

**Personal Use of Corporate Assets**

Theft, carelessness and waste have a direct impact on our profitability. You may not convert our assets to personal use. Our property should be used for Addus' legitimate business purposes and our business shall be conducted in a manner designed to further Addus' interest rather than the personal interest of an individual employee, officer or director. You are prohibited from the unauthorized use or taking of our equipment, supplies, materials or services. All of our assets in the custody of Addus officers or employees are to be returned in acceptable condition upon termination of employment. Directors are to return any of our assets upon the termination of service as a director.

**Use of Company Software**

Our employees use software programs for word processing, spreadsheets, data management, and many other applications. Software products purchased by us are covered by some form of licensing agreement that describes the terms, conditions and allowed uses. It is our policy to respect copyright laws and observe the terms and conditions of any license agreements. Do not reproduce our software without prior authorization. Copyright laws impose civil and criminal penalties for illegal reproductions and use of licensed software.

### **Computer Resources/E-mail**

Our computing resources, which include the electronic mail system, belong to us and not to the employee. They are intended solely for use by employees to conduct Company business and should not be used to conduct person, private or non-business related communication. The use of the computer systems to make or forward derogatory or offensive remarks about other people or groups is prohibited. E-mail messages should be treated as any other written business communication. Our policies regarding our electronic systems and communications are more fully described in our Computer, E-mail and Internet Access Policy.

## **CONFIDENTIAL AND PROPRIETARY INFORMATION**

### **Confidentiality**

Confidential information includes all non-public information that might be of use to competitors, or harmful to us or our consumers, if disclosed. Confidential or proprietary information includes, for example, pricing, technology developed for use by the Company, clinical protocols, financial data, trade secrets and know-how, acquisition and divestiture opportunities, marketing and sales programs and consumer and payor information. Confidential information also includes information that suppliers and consumers have entrusted to us. All information (in any form, including electronic information) that is created or used in support of our business activities is the property of Addus. This Company information is a valuable asset and employees, officers and directors are expected to protect it from unauthorized disclosure. This includes our consumer, payor, and business partner and employee data. Federal and state law may restrict the use of such information and impose penalties for impermissible use or disclosure. However, in no instance does confidential information include information that has been publicly disclosed by the Company or information that is generally known by the public.

You must maintain the confidentiality of information entrusted to you by us or our consumers, payors or consultants except when disclosure is properly authorized by the Company or legally mandated. You shall take all reasonable efforts to safeguard such confidential information that is in your possession against inadvertent disclosure and shall comply with any non-disclosure obligations imposed on Addus in its agreements with third parties.

Information pertaining to our competitive position or business strategies, payment and reimbursement information, information relating to negotiations with employees or third parties and other information that could be considered confidential should be protected and shared only with employees having a need to know such information in order to perform their job responsibilities. In addition, you should not discuss confidential work matters with friends, relatives or other non-employees, or in public places, such as elevators, public transportation (including airplanes) or restaurants.

### **Records Management**

Our corporate records are important assets. Corporate records include essentially everything you produce as an employee, regardless of its format. A corporate record may be in the form of paper, computer tapes, microfilm, e-mail, or voice mail.

We are required by law to maintain certain types of corporate records, usually for a specified period of time. Failure to retain such documents for such minimum periods could subject us to penalties and fines, cause the loss of rights, obstruct justice, place us in contempt of court or place us at a serious disadvantage in litigation. We expect all employees to become familiar with and fully comply with our Record Retention Policy. If you believe documents should be retained beyond the applicable retention period, consult with your supervisor or the Compliance Officer.

## **INTEGRITY OF RECORDS AND COMPLIANCE WITH ACCOUNTING PRINCIPLES**

The preparation and maintenance of accurate and reliable business records is required by law and is of critical importance to our decision-making processes and to the proper discharge of our financial, legal, and reporting obligations. All financial and other business records, including expense accounts, purchase orders, requisitions, bills, payroll, reports to government agencies and other reports, books and records of ours must be prepared with care and honesty. False or misleading entries in such records are unlawful and are not permitted. All corporate funds and assets must be recorded in accordance with generally accepted accounting principles and applicable corporate procedures. No undisclosed or unrecorded corporate funds shall be established for any purpose nor should our funds be placed in any personal or non-corporate account. No director, officer or employee, whatever his or her position, is authorized to depart from our policy or to condone a departure by anyone else.

We maintain a system of internal controls and procedures that we believe provides reasonable assurance that transactions are executed in accordance with management's authorization and properly recorded and that financial records and reports are accurate and reliable. This system includes written policies and procedures. All directors, officers and employees are expected to adhere to these procedures.

Compliance with accounting and internal controls and procedures and auditing procedures is required at all times. We expect for both the letter and the spirit of internal controls and procedures to be strictly adhered to at all times.

## **RELATIONS WITH GOVERNMENT AGENCIES**

Special care must be taken when dealing with government payors. Do not directly or indirectly promise, offer or make payment in money or anything of value to anyone, including a government official, agent or employee of a government, political party, labor organization or business entity or a candidate of a political party or their families, with the intent to induce favorable business treatment or to improperly affect business or government decisions. This policy prohibits actions intended either to influence a specific decision or merely to enhance future relationships. It is also inappropriate in certain circumstances to discuss employment possibilities with government employees while doing business with the government. In short, special care must be taken when dealing with government payors. Contact the Compliance Officer if you have questions concerning compliance with these obligations.

## **SUPPLEMENT STANDARDS FOR PRINCIPAL EXECUTIVE OFFICER AND OTHER SENIOR FINANCIAL OFFICERS**

The Board of Directors has established certain supplemental ethical standards for our Chief Executive Officer, Chief Financial Officer, Controller and principal accounting officer (the "Senior Financial Officers"). The Senior Financial Officers must comply with these standards in addition to all of the other standards contained in this Code.

### **Integrity and Accuracy of Public Disclosures**

The Senior Financial Officers shall take all reasonable steps to provide full, fair, accurate, timely and understandable disclosures in the reports and documents that we file with or submit to the Securities and Exchange Commission and in our other public communications. In the event that a Senior Financial Officer becomes aware of any information that would place in doubt the accuracy or completeness of any such report, document or communication in any material respect, then such officer shall review and investigate such deviation, advise the Board of Directors or the appropriate committee of the Board of Directors regarding the deviation and, where necessary, revise the relevant report, document or communication.

### **Internal Controls**

Each Senior Financial Officer is responsible for promptly bringing to the attention of counsel and, if necessary, the Audit Committee any credible information of which he or she becomes aware that indicates any significant deficiency in the Company's internal control over financial reporting within the meaning of Section 404 of the Sarbanes-Oxley Act and the SEC's or Public Company Accounting Oversight Board's implementing rules, and/or the Company's disclosure controls and procedures for preparing SEC reports or other public communication as mandated by Section



302 of the Sarbanes-Oxley Act and the SEC's implementing rules, even if a materially inaccurate or incomplete disclosure by or on behalf of the Company has not resulted or is not expected imminently to result from such deficiency.

**Accounting Treatment**

Although a particular accounting treatment for one or more of our operations may be permitted under applicable accounting standards, the Senior Financial Officers shall not authorize or permit the use of such an accounting treatment if the effect is to distort or conceal our true financial condition. The accounting standards and treatments utilized by us shall, in all instances, be determined on an objective and uniform basis and without reference to a single transaction or series of transactions and their impact on our financial results for a particular time period. Any new or novel accounting treatment or standard that is to be utilized in the preparation of our financial statements shall be first discussed with the Audit Committee of the Board of Directors and our independent auditors. Additionally, Senior Financial Officers are prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead the Company's independent registered public accounting firm for the purpose of rendering the financial statements of the Company misleading.

**Compliance with Supplemental Standards**

Senior Financial Officers should promptly bring to the attention of the Audit Committee or the Full Board of Directors:

- Any matters that could compromise the integrity of the Company’s financial reports;
- Any disagreement with respect to any material accounting matter; and
- Any violation of this Code or of any law or regulation related to the Company’s accounting or financial affairs.

**CONTACTS AND PHONE NUMBERS**

Human Resources Contact.....	(469) 535 – 8200
Compliance Department.....	(469) 535 – 8200
Ethics Hotline.....	(844) 809 – 9454
Ethics Website.....	<a href="http://www.addus.ethicspoint.com">http://www.addus.ethicspoint.com</a>