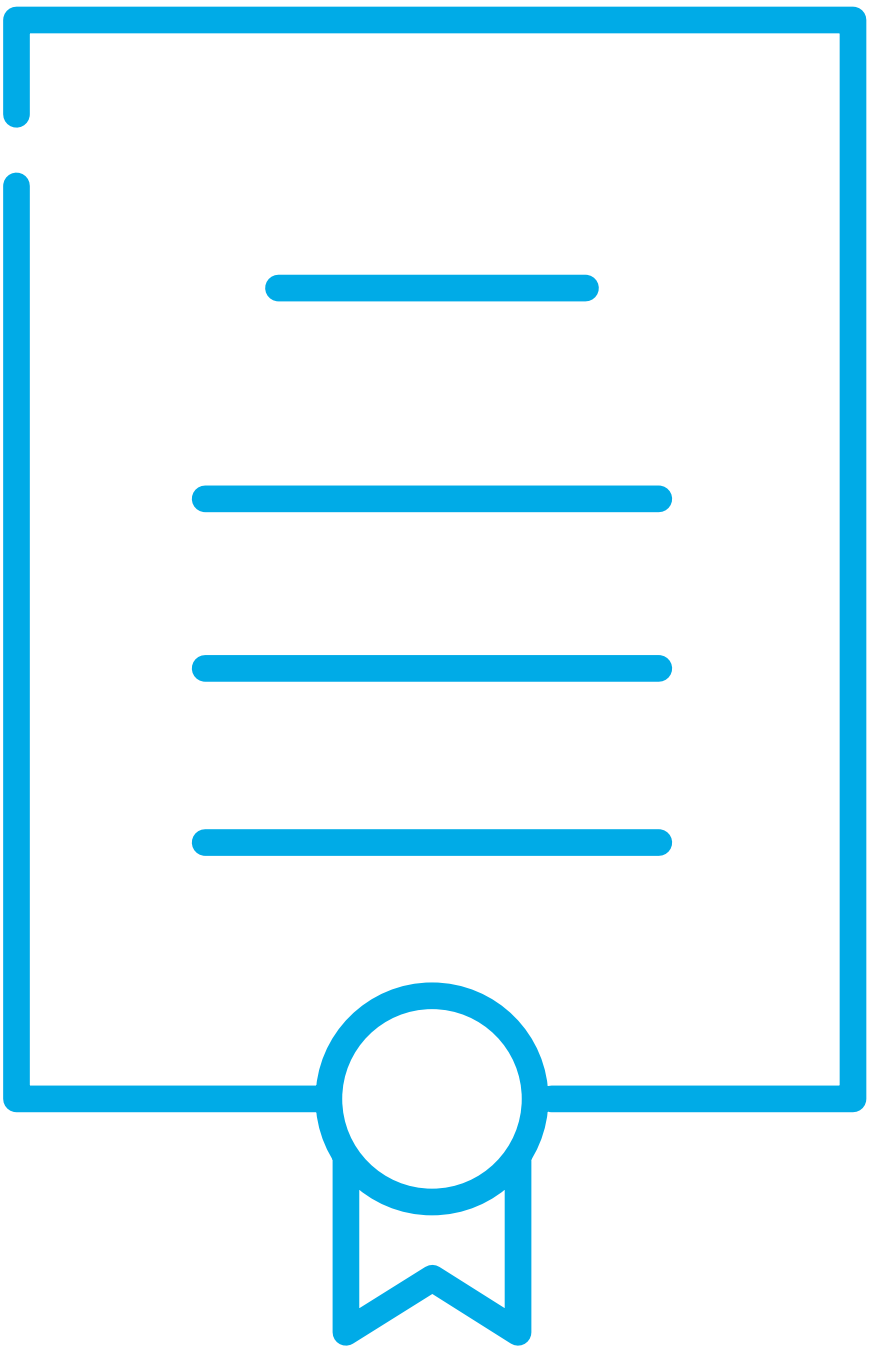


Encompass Health®

Standards of Business Ethics and Conduct

Encompass Health's Standards of Business Ethics and Conduct is not an employment contract. Unless otherwise prescribed by contract or state law, employment with Encompass Health is at will and may be terminated by either the employee or Encompass Health at any time, for any reason or for no reason.

Printed copies are for reference only. The most up-to-date versions of the Standards of Business Ethics and Conduct – in both English and Spanish – are available online at

Standards of Business Ethics & Conduct Manuals

Encompass Health®

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Introduction

A message from leadership

As the nation's preeminent provider of inpatient rehabilitation services, Encompass Health has a responsibility to set high standards for both quality and business integrity. We must remain true to our principles, regardless of the circumstances. There can be no shortcuts or special exceptions. We must always seek to provide the highest quality medical care and to conduct our business and record our financial results with integrity.

Encompass Health's ethical culture is driven by its workforce of compassionate, principled, and highly engaged individuals. We attract and retain top talent, actively seeking out the most qualified candidates. We do not tolerate unlawful harassment or discrimination based on protected characteristics, and we promote an environment of acceptance and inclusion for all our patients and employees.

Our Standards of Business Ethics and Conduct (the Standards) describe a set of shared principles upon which we can build a reputation for excellence. These Standards apply to all aspects of our clinical and business operations. All of us are expected to be familiar with the Standards and use them to govern our conduct at work or when acting on behalf of Encompass Health. In addition, each of us is required to acknowledge that we have read, understood and agreed to abide by the Standards.

Please embrace the Standards as the foundation of a corporate culture based on honesty, openness, acceptance, inclusion and integrity. Our shared commitment to these core principles is the cornerstone of a strong Encompass Health.



Greg Carmichael
Chairman
Board of Directors



Nancy Schlichting
Chair
Compliance and Quality of Care Committee
Board of Directors



Mark J. Tarr
President and
Chief Executive Officer



Dawn Rock-Tremble
Senior Vice President and
Chief Compliance Officer

Encompass Health shared values

We believe integrated care delivery across the healthcare continuum is critical to achieving the best outcomes for patients. We exist to provide a better way to care that elevates expectations and outcomes.

The Encompass Health Way is comprised of five shared values:

Set the standard We are committed to going above and beyond, never settling for anything less than excellence. We pride ourselves on being industry leaders and challenge ourselves to continuously improve.

Lead with empathy We start with empathy, taking the time to understand the physical, mental and emotional needs of each other and those we support. We listen, make deep connections and engage on a personal level to better serve others.

Do what's right We do the right thing the right way, no matter how difficult, even when no one is looking. We are not afraid to have hard conversations. If we make a mistake, we acknowledge it, proactively find a resolution and make it right going forward.

Focus on the positive We have a positive spirit and find the light even in the most difficult situations. We bring our whole self to work. We celebrate successes and inspire others to create meaningful impact.

Stronger together We believe our individual strengths make us stronger together. We take accountability for our actions, connect across teams and lean in to get it done—at all levels of the Company.

Our culturally diverse workforce contributed the ideas, beliefs and principles that later became our shared values. These shared values inspire our actions when operating on behalf of Encompass Health. They are incorporated throughout these Standards.

Who is covered by the Standards of Business Ethics and Conduct

The Standards apply to all Encompass Health directors, officers, employees and volunteers (collectively, Covered Persons). Other professionals who provide healthcare, financial or accounting services to, or on behalf of Encompass Health, are also expected to conform to the Standards while providing services on behalf of Encompass Health.

Why we have the Standards

The Standards are designed to empower Covered Persons to exercise good judgment by providing guidance about key compliance issues, offering practical answers to situations they may face and pointing them in the right direction when they need answers or guidance. The purpose of the Standards is to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- Full, fair, accurate, timely and understandable disclosures in our required reporting

- Compliance with all applicable rules and regulations that apply to Encompass Health
- Prompt internal reporting of violations of applicable laws, regulations, internal policies and procedures, and the Standards to an appropriate person
- Accountability for adherence to the Standards

Covered Persons should always operate in accordance with legal or regulatory guidance and act with the highest level of integrity. When in doubt, seek answers from available resources, including these Standards. No single set of business rules can address every situation. Therefore, a number of other resources are available within Encompass Health to provide assistance with specific questions or concerns. See Appendix A: Quick Reference Guide at the end of the Standards for a list of additional resources.

When faced with a decision, we should all use the Standards and the other resources available, as we ask ourselves:

- Is the action consistent with our core values?
- Can this action withstand public scrutiny?
- Will the action protect our Company or expose our Company to risk?

Why we act with integrity

Ethics and integrity are at the core of our culture. These principles are reflected in the shared values noted above, as well as the Standards. Whether engaged in clinical practice with patients, in negotiations with vendors or interactions with colleagues, Covered Persons are expected to conduct all activities performed on behalf of Encompass Health with the highest level of integrity—whether or not a law or regulation guiding the activity exists. Furthermore, if you are a member of a profession governed by its own rules of ethics or code of conduct, then our Company expects you to abide by those rules in addition to the Standards.

Your obligations under the Standards

You have a responsibility to yourself, your colleagues, our patients, our Company and our community to conduct business legally, ethically and in accordance with our shared values and these Standards. You are expected to read and understand the Standards and apply them every day in the course of your job or dealings on behalf of Encompass Health. It may sometimes seem easier to keep silent or look the other way, but taking no action can result in serious consequences. Remember, we cannot honor our Company's commitment to integrity if we ignore concerns about suspected illegal, non-compliant or unethical actions.

Waiver of the Standards

For members of the board of directors and executive management, compliance with these Standards may not be waived except by action of the board of directors or a committee thereof. For all other Covered Persons, compliance with these Standards may not be waived except upon written permission of the general counsel or chief compliance officer or their designees.

Legal obligations

Encompass Health will comply with federal, state and local laws and regulations that apply to our business. We will reject any business opportunity that would require us to act illegally or in a manner that is inconsistent with these Standards.

- You are expected to know the basic laws and regulations that apply to your job. If you have questions, ask a supervisor or contact one of the Company resources listed in Appendix A: Quick Reference Guide. You are also expected to know and follow the Encompass Health policies and procedures that apply to you and to utilize Company processes and systems in accordance with those policies and procedures.
- The Company will not employ or contract with any person or entity that is ineligible to participate in federal healthcare programs.
- Suspected violations of law or Encompass Health policies must be promptly reported to a supervisor or the legal services department or another company official. See Ask questions and voice your concerns on page 11 of the Standards for more information.

Competitive pressure or "industry practice" is never a valid basis for violating Company policy or regulatory standards. If you believe that a competitor is achieving a commercial advantage by ignoring legal or regulatory requirements, contact legal services or the ethics & compliance department for assistance.

Violations of the Standards or legal obligations

Failure to comply with the law or the Standards can lead to serious consequences for you, your fellow employees, other Covered Persons and our Company. These may include termination of employment; termination of contract; incarceration; personal or corporate fines; recoupment of compensation; exclusion from Medicare and other healthcare programs; loss of credibility with investors and lending institutions; loss of respect by physicians, patients and the community; and poor quality of care.

Because the consequences of not following the law or the Standards are so serious, disciplinary action, up to and including termination of employment or contract, will be taken against any Covered Person who:

- Authorizes or participates in any violation of law, the Standards or Company policies and procedures
- Fails to report or conceals a violation of law, the Standards or Company policies and procedures
- Refuses to cooperate with any internal investigation or audit
- Threatens or retaliates against anyone who reports a violation

All Covered Persons will be subject to appropriate corrective action(s) for substantiated instances of noncompliance, regardless of their position, title, or responsibilities for or on behalf of the Company. Corrective actions are imposed

on a fair and equitable basis as determined by the appropriate decision makers, which may include representatives from Human Resources, Legal Services, and functional leaders of the impacted department(s).

Any supervisor or manager will be subject to disciplinary action if he or she knew, or should have known, about a violation of the law or the Standards and failed to take reasonable actions to prevent or promptly report and correct the situation.

Ask questions and voice your concerns

Open discussion of possible compliance concerns without fear of reprisal is vital to the effectiveness of our ethics & compliance program. Ask questions about policies or practices that you do not understand and promptly report suspected violations of law, policy or the Standards to a supervisor or other appropriate persons. Likewise, supervisors and managers are required to report suspected violations of law, policy or the Standards to the ethics & compliance department or legal services. Our policy, Non-Retaliation and Internal Reporting of Suspected Violations of Compliance Policies or Legal-Regulatory Obligation, prohibits retaliation against anyone who raises a concern in good faith.

Any of the following resources, as well as those listed in Appendix A: Quick Reference Guide, can assist you with questions and concerns.

Your supervisor or department manager

Many questions and problems are best addressed at the department or hospital level. Your supervisor or department manager has access to helpful resources and also knows you and the issues in your workplace better than anyone else. If a supervisor or manager does not have an answer, he or she can reach out for assistance from others in our Company. If your concern is about your supervisor or department manager, you should address the issue with another resource listed in Appendix A: Quick Reference Guide.

Ethics & compliance department or chief compliance officer

Questions or concerns relating to healthcare or other regulatory issues or suspected violations of law, policy or the Standards should be brought to the attention of the ethics & compliance department. The contact information for the ethics & compliance department follows. You may also contact the chief compliance officer directly to discuss concerns or report issues.

Encompass Health
Ethics & Compliance Department
9001 Liberty Parkway
Birmingham, AL 35242
Phone: 205.970.5900
Fax: 205.970.4854
contactcompliance@encompasshealth.com

or

Dawn Rock-Tremble
Senior Vice President &
Chief Compliance Officer
205.970.5900

Confidential ethics & compliance hotline

If your concern has not been resolved to your satisfaction, or if you feel uncomfortable raising a concern through your supervisor, department manager or other Company managers, you may call the toll-free Encompass Health Compliance Hotline (the Hotline) at 888.800.2577 or go online to encompasshealth.mycompliancereport.com to report a concern confidentially and anonymously. The Hotline operates 24 hours a day, seven days a week, and is staffed by an independent company not affiliated with Encompass Health. Your call will not be traced or recorded, and your anonymity will be protected up to the limits of the law. All reports received by the Hotline will be investigated. If a report is substantiated, appropriate corrective actions will be taken.

Internal audit and controls department or inspector general

Questions or concerns relating to accounting, financial reporting and/or safeguarding of assets should be brought to the attention of the internal audit and controls department by phone at 800.755.8215, or by email at encompasshealth.mycompliancereport.com. Encompass Health's inspector general or general counsel may also be contacted directly on any of these issues.

Encompass Health
Internal Audit and Controls Department
9001 Liberty Parkway
Birmingham, AL 35242
Fax: 205.262.3187

Human resources department

If your question or concern involves a human resources or general workplace issue, contact your local human resources representative or the Home Office human resources department at:

Encompass Health
Human Resources Department
9001 Liberty Parkway
Birmingham, AL 35242
Phone: 800.765.4772
Fax: 205.262.3692

While you will never be turned away if you bring a human resources issue to the attention of the ethics & compliance department, a human resources representative will likely investigate your concern if it involves only workplace or other human resource issues.

Here are some examples of the types of concerns that are typically addressed by each department:

Human Resources

- Concern about a hostile work environment
- Problems with a supervisor or co-worker
- Concern your hospital is understaffed
- Concern that a co-worker is not clocking out
- Not getting paid correctly for overtime

Ethics & Compliance

- Concern that someone is not following a regulatory requirement
- Retaliation after a good faith effort to report a suspected violation
- Potential Health Insurance Portability and Accountability Act (HIPAA) violation

- Concern about a suspected conflict of interest
- Suspected fraudulent activity

Quality and clinical excellence department

While the vast majority of concerns are managed quickly at the local level, if you become aware of a quality of care complaint that has not been appropriately addressed at the local level, refer the patient to 800.765.4772 for prompt assistance from the quality and clinical excellence department.

Board of directors

If an issue involves a member of senior management or anyone charged with supervising the compliance or internal audit processes, you have the option of writing directly to the Encompass Health board of directors. All such written communication should be directed to:

Encompass Health
Board of Directors
Attn: Corporate Secretary
9001 Liberty Parkway
Birmingham, AL 35242

If an issue involves possible financial, accounting, internal controls or audit improprieties or a possible violation of federal securities laws or the Sarbanes-Oxley Act of 2002, and you are unable to get a satisfactory resolution through other channels, you may contact the audit committee of the board of directors at:

Encompass Health
Audit Committee of the Board of Directors
Attn: Corporate Secretary
9001 Liberty Parkway
Birmingham, AL 35242

Our commitment to our patients

STANDARD: We will provide high-quality, cost-effective medical care to our patients safely and in accordance with the highest of professional standards.

Patient care will be provided only upon medical orders issued by a physician or another authorized healthcare professional based on the needs of each patient. We will always act in the best interest of the patient.

Key points to remember

- The well-being of patients should be the focus of all of us, whether our roles involve direct patient care or other supportive functions.
- Services should be medically appropriate for the patient. We will not over-utilize or under-utilize the services to our patients.
- Only persons with appropriate training or professional credentials and licenses may furnish or supervise the delivery of medical care. All professionally credentialed personnel are expected to keep their credentials current and to notify the Company promptly if sanctions are threatened or imposed on a professional license.
- No healthcare professional should ever furnish a service or take any action that would violate a professional code of ethics or practice act.



Q&A

Who should I contact if I see a patient not being treated respectfully?

Step in immediately to redirect any situation that could put a patient at risk, then promptly talk to your supervisor or manager.

If necessary, you may also talk to your quality or risk manager or you can call the quality & clinical excellence department at 800.765.4772, or the Hotline at 888.800.2577.

STANDARD: We will treat our patients with dignity and respect.

All patients should be treated with dignity and respect. Patients will not be denied access to medical services based on age, race, ethnicity, religion, culture, language, physical or mental disability, socioeconomic status, sex, sexual orientation, gender identity or expression or any protected classification.

Key points to remember

- Respond promptly and courteously to patients' questions and concerns.
- Provide adequate and accurate information to patients and their families in order to allow them to participate in treatment planning and to make informed treatment decisions.
- Safeguard the personal property of patients.
- Do not offer gifts to, or accept gifts from, patients or their family members of more than nominal value. Avoid any perception that the quality of care furnished is dependent on the offering of gifts or other gratuities. You should not accept cash or cash-equivalents from patients or their family members.
- Do not offer gifts or other financial benefits to Medicare or Medicaid beneficiaries in order to induce them to choose Encompass Health.
- Provide to all patients a list of their rights and responsibilities and the Notice of Privacy Practices upon admission as a patient and upon request.

Policy cross-reference

Home Office
Compliance 202-Gifts or Benefits to/from Medicare or Medicaid Patients

Compliance 500-Nondiscrimination in the Delivery of Healthcare

Hospital (HPOD)
Compliance 202-Gifts or Benefits to/from Medicare or Medicaid Patients

Compliance 500-Nondiscrimination in the Delivery of Healthcare

Interdisciplinary 008-Patient and Customer Compliant or Grievance

Interdisciplinary 010-Use of Restraints

Risk Management 688-Allegations of Abuse/ Neglect

Risk Management 690-Physical Search of Patients' Rooms and Personal Belongings

STANDARD: We will provide safe patient care.

Safe patient care is essential to the well-being and recovery of our patients. We will promote a corporate-wide safety culture based on clinically appropriate policies, systems and equipment.

Key points to remember

- If a Covered Person has a question or concern about whether the Company's quality or patient safety commitments are being met, that Covered Person is obligated to raise the concern to a supervisor or manager until it is satisfactorily addressed and resolved.
- Equipment used to furnish medical services should be safe, effective and properly maintained at all times.

Policy cross-reference

Hospital (HPOD)
Interdisciplinary 002-Wound Assessment and Documentation

Interdisciplinary 010-Use of Restraints

Interdisciplinary 011-Alarm Management

Interdisciplinary 677-Fall Prevention Program

STANDARD: We will maintain accurate clinical records.

All clinical records should be accurate, timely, complete and consistent with our policies and applicable regulations.

Key points to remember

- Medical record entries should be complete and document facts and pertinent information related to an event, course of treatment, patient condition, response to care and deviation from standard treatment.
- If the original entry is incomplete, follow policy guidelines for making a late entry, addendum or clarification.

Policy cross-reference

Hospital (HPOD)
HIM 006-Late Entry and Error Correction

Q&A

I have access to confidential patient information as part of my job. Can I look up anybody's record, even if they are not my patient, as long as I keep the information to myself?

No. It is only acceptable to access patient information when it is necessary for your job. Accessing protected health information (PHI) for any other reason can jeopardize the patient's privacy and your privilege to practice or remain employed by or contracted with Encompass Health.

STANDARD: We will protect the privacy of our patients' health and financial information.

Our hospitals collect and use information about a patient's medical condition, medical history, medication, and family illnesses to provide quality care. We realize the sensitive nature of the data and are committed to protecting the privacy and security of this information. Consistent with HIPAA, we will not use or disclose patients' PHI unless otherwise required or permitted by law. We will also protect patients' financial data in accordance with all applicable state and federal laws.

Key points to remember

- Everyone must take reasonable measures to protect the confidentiality of PHI, whether that information is presented in oral, written or electronic form.
- No one has general authorization to access PHI. Only those who require specific patient information to furnish care, perform quality control activities, bill or collect charges for services, or furnish other administrative services are permitted access to that PHI unless authorized under the law or by the patient.
- Dispose of paper and other records containing PHI and financial data only in secure (locked) shredding bins; open recycling and trash bins are NOT secure and should not be used to discard PHI or financial information.
- Hand off information containing PHI only after you have confirmed that you are giving the information to the correct patient or individual.
- Credit card information may not be communicated through email or fax. If information is requested, the credit card information must be truncated prior to communication.
- Be careful when faxing; ensure the fax number is correct, and that the correct number has been entered into the fax machine.
- If you suspect that a patient's health information has been compromised, you must immediately contact your Hospital HIPAA Officer (HHO) or Encompass Health's Privacy Officer. (Refer to Appendix A: Quick Reference Guide for contact information.)

Policy cross-reference

Home Office
Compliance 701-HIPAA Privacy

Hospital (HPOD)
Compliance 701-HIPAA Privacy

STANDARD: We will dispense drugs and controlled substances in accordance with state and federal law.

Various state and federal laws and regulations govern the use of pharmaceuticals and controlled substances, including how they are ordered, stored, administered and inventoried. Covered Persons handling pharmaceuticals and controlled substances are responsible for knowing and complying with applicable laws and regulations and Encompass Health's policies and procedures.

Key points to remember

- Under the Controlled Substances Act (CSA), providers who dispense controlled substances must ensure the secure storage and distribution of controlled substances and provide effective controls and procedures to guard against theft and diversion.
- The loss or misuse of any controlled substance must be reported immediately to a supervisor or manager.
- Even in states that permit the medicinal and/or recreational use of marijuana, our Company will continue to follow federal law, under which marijuana is an illegal controlled substance.



Policy cross-reference

Hospital (HPOD)
Pharmacy 001-Medication Diversion Prevention

Pharmacy 501-Medical Cannabis and Cannabidiol

STANDARD: We will conduct clinical research in accordance with all applicable laws and protect the privacy of our patients who participate in clinical trials and other human subject research.

We are committed to the highest of professional and ethical standards when conducting research. All research activities conducted at Encompass Health facilities must be reviewed and approved in advance through a process administered by the Home Office clinical research compliance committee. (Refer to Appendix A: Quick Reference Guide at the end of the Standards for contact information.)

Key points to remember

Our policies on clinical research are designed to ensure research protocols have been properly reviewed, patients have been informed and have given their consent to participate and systems are in place to prevent inappropriate billing and/or impermissible access, use or disclosure of confidential information.

Policy cross-reference

Home Office
Compliance 600-Human Subject Clinical Research Activity

Hospital (HPOD)
Compliance 600-Human Subject Clinical Research Activity

STANDARD: We will not discriminate against patients based on their race, color, national origin, sex, age, disability or other protected classification, nor on the basis of sexual orientation or gender identity.

We treat all patients with dignity and respect. We do not tolerate discrimination or harassment. We offer equal access to care in an inclusive environment where all patients are welcome. We do not employ artificial intelligence (AI) in a way that discriminates against patients based on personal attributes such as race, color, national origin, sex, disability, or other protected classifications. We provide culturally competent care that addresses identified racial and social disparities. We provide inclusion and diversity training to our workforce to help them identify unlawful discrimination and harassment and recognize unconscious biases.

Key points to remember

- Seek to understand patients' perspectives.
- Participate in mandatory Inclusion and Diversity training.
- Listen attentively to patients without judgment and be sensitive to cultural needs.

- Reject existing stereotypes and challenge long-held beliefs about marginalized populations.
- Be mindful of each patient's unique needs and affirm their individuality.

STANDARD: We will provide culturally competent, patient-centered care.

We systematically identify health disparities that impact our patients. We seek to address cultural barriers to care. We actively seek to understand social determinants of health in order to provide holistic and individualized care. We are respectful of each patient's individual circumstances, needs, and preferences. We acknowledge and seek to understand diverse cultures and backgrounds of patients and their families to better meet their needs. We provide nondiscriminatory access to care for all who seek our services. We deliver culturally inclusive healthcare that is free from implicit bias.

Key points to remember

- Respect cultural differences and seek to accommodate them when possible.
- Address any potential health inequities at all stages of the care episode.
- Always strive to meet or exceed the needs and expectations of the individuals we serve by creating a culture of comfort, professionalism and respect.

STANDARD: We will ensure patients, their providers and appropriate third parties have access to electronic health information when they need it.

Encompass Health's interoperability of health information technology (IT) practices enable the secure exchange and use of electronic health information (EHI) without special effort on the part of the user. Encompass Health IT practices allow for complete access, exchange, and use of all electronically accessible health information for authorized use under applicable state and federal law. We will not implement IT practices that may lead to, or appear to lead to, fraud, waste, or abuse, or impeded innovations and advancements in health information access, exchange, and use. It is the aim of Encompass Health never to engage in any practice that may be viewed as information blocking, such as unreasonably withholding patient information from those who are legally permitted to obtain it.

Key points to remember

- Patients have the right to view their own medical record information in the manner they request, including electronically.
- We will not unreasonably withhold patient information from those who have proper authorization or legal reason to have it.
- Always verify the legal authority and identity of the person requesting patient information.
- Report accusations that Encompass Health is blocking legal access to patient information to the Privacy Officer.

Policy cross-reference

Home Office
CMP 701: HIPAA Privacy

Hospital (HPOD)
CMP 701 Attachment A: HIPAA Policy and Procedure Manual

Our commitment to each other

STANDARD: We will foster a respectful and inclusive workplace free of discrimination, harassment or violence.

We value a diverse workforce and an inclusive culture, which contributes to creativity and business growth. We do not tolerate unlawful discrimination or harassment.

We will not tolerate physical violence or threats of violence. This includes abusive or aggressive behavior intended to threaten or intimidate another person.

Key points to remember

- Treat colleagues and customers with dignity and respect.
- Everyone is responsible for ensuring that our Company is free from discrimination and harassment.
- If you know or suspect that someone is being harassed or discriminated against, report it to your supervisor or manager, human resources representative or the Hotline.

Policy cross-reference

Home Office
Human Resources 414-ADA Reasonable Accommodation

Human Resources 416-Disruptive Behavior

Human Resources 420-California Harassment, Discrimination and Retaliation Prevention

Human Resources 101-Equal Employment Opportunity

Human Resources 409-Harassment

Human Resources 415-Religious Observances or Practices Reasonable Accommodation

Hospital (HPOD)
Human Resources 414-ADA Reasonable Accommodation

Human Resources 416-Disruptive Behavior

Human Resources 420-California Harassment, Discrimination and Retaliation Prevention

Human Resources 101-Equal Employment Opportunity

Human Resources 409-Harassment

Human Resources 415-Religious Observances or Practices Reasonable Accommodation

Q&A

One of my co-workers is going through a difficult divorce, and he has not been himself lately. He gets angry and yells at people over any small issue, and I am scared that he may become violent. What should I do?

Your co-worker's behavior is aggressive and is not acceptable. This should be reported immediately to your supervisor or manager or human resources.

STANDARD: We will foster a safe and healthy environment free of substance abuse.

Encompass Health has a vital interest in maintaining a safe and healthy environment. All Covered Persons must be free from the impairment caused by alcohol, drugs or other substances (even those permitted under state law).

Key points to remember

- Alcohol, illegal drugs and controlled substances can adversely affect safety, productivity, attitude and judgment. They have no place at Encompass Health.
- Being under the influence of drugs or alcohol on the job poses serious safety and health risks to the user and all who come in contact with the user.
- Covered Persons should seek assistance through the employee assistance program (EAP) or their healthcare provider before substance abuse problems lead to attendance or performance problems.

Policy cross-reference

Home Office
Human Resources 665-Drugs and Alcohol

Hospital (HPOD)
Human Resources 665-Drugs and Alcohol

STANDARD: We do not tolerate retaliation.

Anyone who, in good faith, is following these Standards and doing the right thing, will not be retaliated against for doing so. This includes:

- Seeks advice
- Raises a concern
- Asks a question regarding a policy or practice
- Reports actual or suspected misconduct
- Participates in an investigation or legal proceeding

We take claims of retaliation seriously. If you believe that you, or someone you know, is the subject of retaliation for reporting a compliance or financial integrity concern, immediately report it to your human resources representative, the chief compliance officer, or general counsel. The Company investigates all allegations of retaliation.

A good faith report is one that is made with the sincere intention to inform Encompass Health leadership of an action, activity or behavior that the Covered Person honestly believes to be a violation of legal or regulatory obligations, internal policy or the Standards.

Key points to remember

The facts and circumstances of each situation will determine whether a particular action was motivated by legitimate reasons or retaliation. Depending on the facts, examples of retaliation may include:

- Firing or laying off
- Making threats
- Demoting
- Harassment
- Disciplining
- Reassignment to a less desirable position
- Actions affecting prospects for promotion
- Reducing pay or hours
- Subtle actions such as isolating, ostracizing, mocking or falsely accusing the employee of poor performance
- Denying overtime or promotion

Policy cross-reference

Home Office
Compliance 100-Non-Retaliation and Internal Reporting of Suspected Violations of Compliance Policies or Legal-Regulatory Obligation

Hospital (HPOD)
Compliance 100-Non-Retaliation and Internal Reporting of Suspected Violations of Compliance Policies or Legal-Regulatory Obligation

STANDARD: We protect the health and safety of our co-workers.

We strive to be a leader in safety and rely on the sound judgment of all Covered Persons to operate our hospitals safely. Success requires not only attention to detail, but also compliance with our policies and the consistent execution of safe work practices on the job.

Key points to remember

- Everyone is expected to be familiar with the potential hazards in their workplace and to comply with government regulations and Company policies relating to workplace safety, such as:
  - Safety management improvement plans
  - Standard precautions for potentially infectious materials
  - Storage and use of hazardous materials
  - Safety and emergency plans
  - Ergonomic safety
  - Infection control procedures
  - Sentinel event and other incident reporting
- Federal and state laws regulate the handling and disposal of many infectious materials (e.g., blood and other bodily fluids, used needles and syringes or chemicals) that may present a hazard to Covered Persons or to the local community if not properly controlled.
- Any unsafe conditions should be reported promptly to a supervisor, manager, human resources representative, the Home Office human resources or risk management department at 800.765.4772 or the Hotline at 888.800.2577.

Policy cross-reference

Home Office

Risk Management 631-Vehicle Incident Report

Risk Management 633-Vehicle Safety

Risk Management 679-Violence Prevention Program

Risk Management 612-Workers' Compensation Claims Management

Hospital (HPOD)

Risk Management 631-Vehicle Incident Report

Risk Management 633-Vehicle Safety

Risk Management 679-Violence Prevention Program

Risk Management 612-Workers' Compensation Claims Management

Plans 666-Blood-Borne Pathogens Exposure Control Plan

Risk Management 600-Electronic Event Reporting

Risk Management 662-OSHA Recordkeeping and Posting (Occupational Safety and Health Administration)

Infection Prevention and Control 674-Respiratory Protection Program

Risk Management 692-Sentinel Events Plans 180-Safety Plan

Interdisciplinary 664-Safe Patient Mobility (Employee Injury Prevention)

Risk Management 667-TB Screening Form and Post-Job Offer Questionnaire

Interdisciplinary 683-Safe Patient Mobility Not Utilizing STOP II

Infection Prevention and Control 673-Tuberculosis Exposure Program

STANDARD: We provide equal opportunities in employment and advancement by actively promoting diversity and inclusion in recruiting, hiring and promotion practices.

We recognize and embrace differences within our workforce. In accordance with our commitment to diversity and inclusion, we recruit qualified applicants from various backgrounds for positions at all levels within the company. We offer equal employment opportunities regardless of a person's race, ethnicity, sex, sexual orientation, gender identity or expression, religion, national origin, color, creed, age, mental disability, physical disability or any other protected classification. We employ a merit-based progression system that seeks to promote equity in advancement decisions and succession planning.

We frequently communicate our commitment to diversity, equity, and inclusion in words and in action. We routinely assess the diversity of our workforce, and develop initiatives to foster an inclusive and equitable workplace.

Key points to remember

- An inclusive, diverse, and equitable work environment starts with you. Treat everyone you encounter fairly and with dignity and respect.
- Report incidents of discrimination or harassment immediately.
- Be respectful, open, and civil when engaging in sensitive dialogue about social disparities.
- Comply with all laws, rules, and regulations

related to non-discrimination and unlawful harassment.
- Seek to understand colleagues' backgrounds and cultures.
- Participate in mandatory Inclusion and Diversity training.
- For more information about Encompass Health's inclusion and diversity efforts, visit the diversity, equity & inclusion website.

Our commitment to our company

STANDARD: We do not reveal or trade on inside information.

Because of your relationship with Encompass Health, you may become aware of information concerning the Company that is not available to the public, but that would be considered material or important by an investor in deciding whether to buy or sell Company stock or the stock of another company that has a significant business relationship with Encompass Health. This is commonly referred to as "insider trading."

Key points to remember

- Insider trading is illegal and can result in disciplinary action and civil and criminal penalties.
- Anyone who discloses confidential information to outsiders may still be held accountable under federal law for any misuse of such information, even if no stocks are bought or sold.
- Covered Persons should be cautious in discussing Company information with anyone outside of Encompass Health, including, but not limited to, friends, family or acquaintances.
- Know what kind of information is material, nonpublic information, and do your part to protect it.

Policy cross-reference

Home Office
Legal Services 003-Insider Trading

Hospital (HPOD)
Legal Services 003-Insider Trading

Q&A

My uncle, a stockbroker, keeps asking me if we are going to build any new hospitals. I think he might be trying to get confidential information. I really want to just say, "Yeah, we are working on that now, but I can't tell you anything more than that." Is it OK to say that?

No. Telling people outside work our confidential information is never OK, even if it is not the entire story or is done casually.

Q&A

A colleague was working on a new therapy modality before she left. Can she tell her new employer about our new modality?

No. When your colleague was hired, she agreed that she would not use confidential information for her own benefit or disclose it to others, even if she developed the new modality. That obligation is a permanent one that continues even after her employment with Encompass Health ended.

STANDARD: We protect our confidential information.

Confidential information includes all information that Encompass Health has not publicly disclosed. This includes nonpublic financial information; business strategies; contract terms; employment and personnel information; information about our relationships with patients, suppliers, providers or government agencies; proprietary information, such as trade secrets, software and protocols and procedures; and any other information that gives us a competitive advantage. We safeguard our confidential information because it is one of our most valuable assets.

We never use confidential information for our personal benefit, and we never disclose it to others (including family members and friends) or anyone at work who does not have a need to know it.

Key points to remember

- Be careful not to inadvertently disclose confidential information by discussing it where others can overhear it, leaving it in public places or forwarding it by email outside the Company.
- Your responsibility to protect the Company's confidential information continues even after your employment or contract ends.
- This standard is not intended to restrict any legally protected activity or exercise of rights under applicable federal, state or local law.

Q&A

I accidentally overheard a conversation about Encompass Health possibly purchasing another company. Is it OK for me to purchase stock in the targeted company?

No. The information that you now have is considered "non-public" or "inside" information and "material" information. If you trade or tip others to trade based on this information, it is considered insider trading, which is illegal.

STANDARD: We are careful when communicating with investors and the media.

To protect our reputation and our Company, and to make sure that any information communicated is accurate, only the Company's Home Office marketing and communications department (and those preapproved by that department) is authorized to speak directly to the media about our Company. If the media contacts you, direct them to the Home Office marketing and communications department.

Key points to remember

- Covered Persons are required to obtain specific approval from legal services prior to disclosing to anyone confidential or "non-public" information about Encompass Health.
- In general, only Encompass Health's executive officers and specifically designated members of the investor relations, and Home Office marketing and communications and finance departments should speak to investors, market professionals or the media about Encompass Health.
- Covered Persons should coordinate any media contact with the Home Office marketing and communications department.

Policy cross-reference

Home Office
Administration 001-Media/Photography: Non-Patient Care

Hospital (HPOD)
Administration 001-Media/Photography: Non-Patient Care

STANDARD: We are responsible on social media.

We respect the rights of our Covered Persons to maintain personal blogs or post comments on social networking sites outside of the workplace on their own time. However, employees may not disclose on any personal blog or social networking site photographs or protected health information of patients or any other non-public confidential information of the Company.

This standard is not intended to restrict the rights of employees covered by the National Labor Relations Act to engage in protected activity nor is it intended to limit employees' rights under any other applicable law.

Key points to remember

- Covered Persons are responsible for the content of their postings and publications on social media.
- Patient information and non-public information pertaining to Encompass Health should NEVER be posted on social networking sites and/or blogs.

- Never post pictures of patients on social media.
- If you list your work affiliation on a social network, remember that your messages may reflect on our Company and your colleagues. You should make it clear that you are speaking for yourself and not on behalf of Encompass Health.

Policy cross-reference

Home Office
Human Resources 418-Social Networking

Hospital (HPOD)
Human Resources 418-Social Networking

STANDARD: We use good judgment when pursuing outside activities and interests.

Participation by Covered Persons in political, charitable, civic and other organizations is permitted and encouraged as long as it is done appropriately. Encompass Health respects the diversity of interests among us. However, your participation should not cause an observer to conclude that Encompass Health is endorsing the activity. Participation also must not impede your ability to perform your job. You may not pursue personal interests when you are required or expected to perform your duties and responsibilities for Encompass Health.



Key points to remember

- Exercise good judgment and never engage in activities that impede your ability to perform your job.
- Do not use the property or resources of Encompass Health for your personal activities.

Policy cross-reference

Home Office

Human Resources 411-Non-Solicitation

Human Resources 418-Social Networking

Human Resources 417-Dating/Romantic Relationships in the Workplace

Compliance 115-Conflicts of Interest

Hospital (HPOD)

Human Resources 411-Non-Solicitation

Human Resources 418-Social Networking

Human Resources 417-Dating/Romantic Relationships in the Workplace

Compliance 115-Conflicts of Interest

STANDARD: We maintain accurate books and records and honor our reporting obligations.

Both federal law and our policies require that we disclose accurate and complete information about our business, financial condition, clinical outcomes and operations. Covered Persons must cooperate with government inquiries, as well as internal and external audits and investigations. Covered Persons will assist in the development, execution and enforcement of effective internal controls to ensure contracts, payments and other business transactions are properly authorized, conform to our policies and procedures and are recorded timely and accurately in accordance with generally accepted accounting principles. Covered Persons will also immediately report any material omission that may affect our public disclosures, or any questionable accounting or auditing matters to all local supervisors, the internal audit and controls department, the inspector general, the legal services department or the ethics & compliance department.

Key points to remember

- Examples of improper documentation include, but are not limited to: submitting inaccurate expense reports; making false or misleading statements in documents submitted to the government in order to receive payment; and miscoding procedures.
- Covered Persons should respond to any questions from the accounting department, internal audit and controls or the Company's auditors promptly, completely and truthfully.
- Covered Persons should be familiar and comply with our record retention policies and procedures applicable to the documents in their control.
- Covered Persons are expected to adhere to applicable professional code(s) of ethics (e.g., CPAs with the AICPA's Code of Professional Conduct; nurses with the ANA Code of Ethics for Nurses; physical

therapists with the APTA Code of Ethics for the Physical Therapist, etc.).

- Special care should be taken to preserve documents that are known to be subject to a government investigation, litigation or audit.

Policy cross-reference

Home Office
Accounting 150-Accounts Receivable & Related Allowances

Accounting 200-Accrued Liabilities and Compensated Absences

Accounting 700-Journal Entry Review and Approval Process

Accounting 750-Other Assets

Accounting 800-Revenue Recognition

Accounts Payable 201-Employee Expense Reimbursement

Legal Services 004-Records Management Policy

Legal Services 878-Disclosure Controls and Procedures

Hospital (HPOD)
Administration 201-Employee Expense Reimbursement

Legal Services 004-Records Management Policy

Q&A

We have a bill ready to drop, and we are missing a critical item of documentation, which we expect to receive the next day. May we go ahead and send the bill?

No. Bills may not be submitted until all required documentation is accounted for and we can show all services were provided to the patient.

Q&A

Certain documents in my possession have been placed on a "legal hold" by legal services. I want to free up some storage space and copies of some of these documents are kept in other departments. May I shred or delete the ones I think are duplicates?

No. All documents that are related to a "legal hold" must be retained until you are notified by legal services that the hold has ended.

STANDARD: We protect the Company's physical and financial assets.

Everyone is expected to manage the Company's physical and financial assets and other resources honestly and efficiently. This includes property of joint ventures or other entities that are affiliated with Encompass Health. Covered Persons will obtain the proper authorization or approval prior to the use or commitment of Company assets.

Key points to remember

- Company assets should be used for business purposes only.
- When Company property becomes surplus, obsolete or unusable, it should be disposed of in accordance with applicable policies and procedures.
- You should immediately report missing property, as well as any unusual circumstances surrounding the disappearance of Company assets.
- Our funds may never be diverted for personal use, even temporarily, or used for any purpose that is not authorized and approved in accordance with applicable policies and procedures.

Policy cross-reference

Home Office

Asset Management 305-Capital Commitment and Spending

Asset Management 301-Capitalization of Property and Equipment

Asset Management 302-Determination of Useful Lives—Property and Equipment

Asset Management 304-Property & Equipment: Impairment

Asset Management 306-Transfers of Capital Assets

Supply Chain Operation 114-Equipment or Product Return

Supply Chain Operation 110-General Procurement

Accounts Payable 130-Petty Cash

STANDARD: We are cautious with gifts, meals and entertainment.

We conduct our business based on the merits of our clinical services. Because giving or receiving gifts or hospitality to or from vendors, physicians and other referral sources can compromise our objectivity, or give the appearance that someone is trying to influence a business or clinical decision, Covered Persons should only give or accept gifts, meals or entertainment as set forth in the applicable policies.

Key points to remember

- An infrequent meal or other entertainment is usually acceptable if it is of reasonable value and the purpose of the meeting or attendance at the event is business related.

- Items or services that are customarily provided to all Covered Persons, such as discounted travel arrangements, are generally acceptable and not considered gifts. Discounts on personal purchases are also acceptable if they are generally offered to all Covered Persons.
- Gifts of cash or cash equivalents (such as gift card and gift certificates) in any amount are never permitted, nor is accepting any gift or hospitality that is illegal or is part of an agreement to do or give something in return to induce a referral.

Q&A

May I give a physician a $50 Visa gift card out of gratitude?

No. Giving cash or cash equivalents – including gift cards – violates our Gifts, Meals and Entertainment policy.

A supplier has a luxury suite at the local stadium. Can I ask for tickets to a sporting event?

No. It's never acceptable to solicit gifts or hospitality from anyone doing, or seeking to do, business with our Company.

Policy cross-reference

Home Office

Compliance 202-Gifts or Benefits to/from Medicare or Medicaid Patients

Compliance 200-Gifts, Meals, and Entertainment to Referral Sources & Medical Staff Incidental Benefits for Physicians

Compliance 203-Vendor Relationships and Gifts

Compliance 201-Free or Discounted Local Transportation of Patients

Hospital (HPOD)

Compliance 202-Gifts or Benefits to/from Medicare or Medicaid Patients

Compliance 200-Gifts, Meals, and Entertainment to Referral Sources & Medical Staff Incidental Benefits for Physicians

Compliance 203-Vendor Relationships and Gifts

Compliance 201-Free or Discounted Local Transportation of Patients

Q&A

I mentioned to several competitors that we would soon be filing for regulatory approval to expand the number of beds in our hospital. I just learned that one of our competitors has filed an application with a state agency to add beds to their hospital. Did I do something wrong?

Yes. Discussions with competitors about commercial or competitive matters carry significant antitrust risk. Regulators may use these discussions to allege that industry members reached a tacit agreement to violate the law. Violations can be serious criminal matters resulting in severe fines for our Company and fines and imprisonment for individuals.

Particular care should be taken when pursuing joint ventures or alliances with other healthcare providers. Care should also be taken when participating in trade associations. It is generally acceptable for their members to cooperate on quality or public policy-related activities. Other forms of cooperation should be avoided. Questions relating to antitrust and business competition should be directed to legal services. See Appendix A: Quick Reference Guide for contact information.

STANDARD: We avoid conflicts of interest.

Conflicts of interest, as well as the appearance of conflicts, between your private interests and the interests of Encompass Health are prohibited. A conflict of interest exists when you, or a member of your immediate family (i.e., spouse, domestic partner, parent, sibling, children and their spouses or domestic partner's children and their spouses), are involved in any activity that could affect your objectivity in making decisions. Covered Persons also should not compete with Encompass Health; use its property, information or their positions with the Company for personal gain; or take for themselves opportunities that are discovered through the use of the Company's property or information or their positions with the Company. Covered Persons owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Finally, all Covered Persons must disclose any investment or other financial interest in an Encompass Health competitor or counterparty. This includes, without limitation, investments, financial interests or employment by a spouse or other immediate family member.

The following is a non-exclusive list of examples where a conflict of interest may exist:

- Steering business to a vendor in which the Covered Person or a family member has a personal financial interest
- Conducting private business on Encompass Health's time

- Engaging in outside employment that interferes with the Covered Person's responsibilities to Encompass Health
- Taking advantage of a business opportunity presented to Encompass Health for the Covered Person's own purposes
- Receiving improper personal benefits, including loans or guarantees of obligations, as a result of your position with the Company
- Marketing or promoting products or services in competition with Encompass Health's current or potential business activities

Key points to remember

- Do not use your position, contacts or knowledge about the Company for personal gain.
- In general, employees are permitted to hold other jobs and maintain other financial relationships, so long as doing so does not put the employee in a position to compromise confidential or proprietary information or prevent him or her from meeting the performance standards of their position at Encompass Health.
- Any outside employment or other financial relationships that might present a potential conflict must be disclosed in accordance with the Conflicts of Interest policy. The conflicts of interest committee will evaluate and document potential conflicts and detail mechanisms for managing the conflicts, if applicable.
- If you have a question about whether a specific situation constitutes a conflict of interest or want to report any potential conflict of interest, you should disclose the matter to your supervisor or manager or the ethics & compliance department. To determine if a conflict of interest exists, Covered Persons may be required to provide additional information via an online questionnaire.

Policy cross-reference

Home Office
Compliance 115-Conflicts of Interest

Hospital (HPOD)
Compliance 115-Conflicts of Interest



Our commitment to our community

STANDARD: We compete fairly.

We will compete vigorously and fairly in the marketplace. Antitrust laws prohibit business practices that interfere with free and open competition among companies. Therefore, we will not seek to restrict competition through unlawful monopolistic or predatory practices.

We will never:

- Discuss or exchange information (public or private) relating to prices, fees, rates, costs, market shares, expansion plans, marketing programs, vendor and labor costs or terms and conditions of sale or supply unless authorized or otherwise permitted in the ordinary course of business
- Agree with our competitors to raise, lower or stabilize prices or any element of price, including discounts, fees, surcharges and credit terms
- Agree with our competitors to divide or allocate markets, services, territories or patients
- Agree to boycott any business
- Require customers or suppliers to avoid dealing with any of our competitors as a condition for keeping our business

Key points to remember

- Violations of antitrust laws are subject to criminal sanctions, which may include fines or imprisonment.
- Consult with legal services before attending meetings with competitors where competitively sensitive issues may be discussed.
- Antitrust laws are complicated and can be difficult to understand. Contact legal services if you have doubts about the legality of an agreement.
- Consult legal services if you have questions about the legality of agreements with competitors and the limits of permitted conduct.

STANDARD: We work professionally with trade associations.

Attending meetings of professional associations and trade associations is both legal and proper if they have a legitimate business purpose. However, we must be cautious when attending. Never discuss prices, fees or pricing strategies. In addition, do not discuss nonpublic financial information or other proprietary or competitively sensitive information.

Key points to remember

- Never discuss competitively sensitive information at industry meetings.
- If the discussion turns to competitively sensitive issues, clearly and unambiguously excuse yourself from the discussion. Immediately leave the meeting or hang up the phone, then notify legal services.
- If you are uncertain whether a discussion

topic is appropriate, defer the conversation until you have discussed it with legal services.

STANDARD: We engage in fair dealing.

Covered Persons should deal fairly with Encompass Health's customers, patients, suppliers, competitors and other Covered Persons, and should not take unfair advantage of anyone by manipulation, misrepresentation or abuse of information.

Key points to remember

Covered Persons are expected to deal fairly and honestly with Encompass Health in recording hours worked, scheduling and reporting time off, using Encompass Health property, seeking reimbursement for business-related expenses and all similar matters.

Policy cross-reference

Home Office
Human Resources 405-Absenteeism and Tardiness

Human Resources 411-Non-solicitation

Human Resources 128-Employment of Relatives

Compliance 115-Conflicts of Interest

Hospital (HPOD)
Human Resources 405-Absenteeism and Tardiness

Human Resources 411-Non-solicitation

Human Resources 128-Employment of Relatives

Compliance 115-Conflicts of Interest

Q&A

I used to work for the local acute care hospital. Can I share details about their sales strategy with members of my group?

No. You have a responsibility to protect the confidential information of your prior employer just as you would have a responsibility to protect our confidential information if you left Encompass Health. If you're unsure, do not disclose the information until you have discussed it with legal services or the ethics & compliance department.

STANDARD: We seek business openly and honestly.

We do not offer, pay, authorize or promise to pay money or provide anything of value to government officials or government employees in order to retain or obtain business, or to influence or induce government officials or employees to take, or refrain from, a particular official act on our behalf. We also have a "no gifts" policy for members of Congress and state legislators and their staffs.

Key points to remember

- Bribes include money or anything of value (e.g., gifts, services, offers of employment, fee waivers, free tickets or upgrades) that can be used to obtain a benefit. There is no

exception just because the value is small.

- Things that are generally not bribes include social engagements (e.g., working lunch with a business partner), reasonable and proportionate hospitality or promotional expenditures, and modest gifts to business contacts at certain times of the year (e.g., Christmas), unless given with the intent to obtain a benefit.
- Never give or offer money or anything of value to any other person if you know or suspect it will be perceived as a bribe to a government official or employee, such as making a contribution to a charity at the request of or for the benefit of someone else. Knowing or suspecting includes consciously avoiding the truth or ignoring clear red flags that a transaction is likely improper.
- Covered Persons who pay bribes are subject to criminal sanctions, including heavy fines and imprisonment.
- If a government official or employee ever demands a gift, service, special treatment or tickets to a sporting or other event, politely refuse and contact the ethics & compliance department or legal services.
- The fact that something is a normal business practice by local standards does not make it permissible if it does not comply with state or federal law, Encompass Health policies or the Standards.

Policy cross-reference

Home Office
Compliance 115-Conflicts of Interest

Hospital (HPOD)
Compliance 115-Conflicts of Interest

STANDARD: We respect intellectual property and confidential information.

Intellectual property includes patents, trademarks, copyrights and trade secrets. All Covered Persons must safeguard Encompass Health's intellectual property and keep it strictly confidential. Moreover, if you have access to another company's intellectual property, make sure you obtain authorization from legal services to use it and that your use complies with our Company's policies and procedures. We may also have confidentiality obligations under the terms of contracts with third parties. This includes keeping their software, source code and other proprietary information confidential from anyone not authorized to receive it.

Key points to remember

- Safeguard Encompass Health intellectual property. Treat it as confidential.
- Violation of copyright laws can result in heavy fines. Covered Persons who willfully violate copyright laws can be subject to criminal sanctions as well, including imprisonment.
- Failure to follow contractual obligations to protect our vendors' confidential information could put the Company and you at significant legal and financial risk.
- We treat others' confidential information with the degree of care required by our contractual obligations and, at a minimum, as confidential as we treat our own.

Q&A

My friend at another healthcare organization forwarded me an industry survey report that her organization recently completed. Many of the observations in the survey report would be interesting to many of my colleagues at Encompass Health. Can I forward the report to interested colleagues at Encompass Health?

No. Since the report was not created by Encompass Health or otherwise made public by your friend's organization, you should treat it as the intellectual property of that organization and maintain its confidentiality.

STANDARD: We interact with the government honestly, ethically, and in accordance with the law.

We will maintain the highest standards of legal and ethical conduct in transacting business with local, state and federal governments. We will not submit false claims or statements to a federal or state agency or in connection with any government contract. We will also not conceal, avoid or decrease a legitimate obligation to pay the government.

Key points to remember

- A company that submits false claims can receive heavy civil and even criminal monetary penalties.
- False statements contained in a government filing or report could subject the Company or the employee responsible for preparing and submitting the filing or report to civil or criminal penalties.
- If you suspect that a false claim has been made, immediately contact the ethics & compliance department at 205.970.5900 or the Hotline at 888.800.2577.
- Immediately contact legal services at 800.765.4772 if you are contacted by a government agent in connection with an investigation of Encompass Health.
- Immediately contact the risk management department at 800.765.4772 regarding investigations by the Occupational Health and Safety Administration (OSHA), Environmental Protection Agency (EPA) or the Food and Drug Administration (FDA).

Policy cross-reference

Home Office
Compliance 410-Compliance with Federal and State False Claims Acts (including Whistleblower Protection)

Compliance 113-Procedure for Identifying and Returning Overpayments from the Medicare or Medicaid Programs

Hospital (HPOD)
Compliance 410-Compliance with Federal and State False Claims Acts (including Whistleblower Protection)

Compliance 113-Procedure for Identifying and Returning Overpayments from the Medicare or Medicaid Programs

STANDARD: We follow political contribution and lobbying laws.

State and federal laws regulate when and how corporate funds may be used in the political process (e.g., direct monetary support of candidates and political parties or lobbying). Covered Persons are prohibited from using any corporate funds or resources to help or promote any political candidate or party unless they have obtained approval from the governmental affairs department. Unless otherwise permitted based on his or her position, Covered Persons must obtain written approval from the governmental affairs department before communicating with policymakers (congressional and executive branch) about state or federal legislation, executive orders, regulatory matters and other programs and policies and positions of any state or the U.S. government that may be related to Encompass Health or other healthcare-industry matters.

Key points to remember

- Lobbying laws can be complex, so if you have any questions about whether your activities on behalf of the Company could be considered lobbying, contact the governmental affairs department or legal services.
- Examples of prohibited activities include: using Company funds to purchase tickets to a political event, paying colleagues to work at a political function or making cash contributions or offering Company assets or services (such as a flight upgrade) to benefit a candidate or political party.
- Do not include any expense that could be considered a political contribution in any expense statement, disbursement or request for a disbursement of funds.
- Refrain from performing volunteer campaign work while at work and do not use Company time, facilities, email or phone systems for political purposes.
- When participating in political activities do not speak or act on behalf of Encompass Health or let anyone think that you are speaking or acting on behalf of Encompass Health.
- Company policies are not intended to encourage or discourage Covered Persons from making personal contributions to candidates, parties or political action committees.
- Eligible Covered Persons may contribute to Encompass Health's political action committee (PAC). However, no employee will be compelled or pressured to do so.
- Violations of campaign finance laws can receive heavy fines. Covered Persons who willfully violate the laws can be subject to criminal sanctions, including substantial fines and imprisonment.

Policy cross-reference

Home Office
Governmental Affairs 100-Government Affairs and Political Activities

Governmental Affairs 101-Election-Related Communications to Employees

Hospital (HPOD)
Administration 101-Election-Related Communications to Employees

STANDARD: We strictly adhere to all state and federal fraud, waste and abuse laws.

Federal law prohibits a healthcare provider from paying or receiving kickbacks or other improper inducements to or from anyone for the referral of a patient or for the purchase or ordering of healthcare products or services that are paid for with federal healthcare funds. Many states have similar laws. These laws also prohibit referrals of certain types of services that are paid by government entities to entities in which the physicians have financial relationships. Entities are prohibited from making claims for such services as well.

Key points to remember

- Fraud and abuse laws apply not only to physicians, healthcare professionals, hospitals and other referral sources, but also to nursing homes, case managers, discharge planners and other professionals in a position to influence healthcare referrals, purchases or orders. These laws cover:
  - The offer or payment of a kickback or other improper inducement to secure referrals, purchases or orders
  - The request or receipt of an improper payment in exchange for referrals, purchases or orders of healthcare services
  - Improper payments or inducements can take many forms, including:
    - Above fair market value lease payments to a referral source or free or below fair market value lease payments from a referral source
    - Loans to referral sources with below market interest rates or other terms that do not meet commercial lending standards
    - Professional services contracts (e.g., medical director agreements) for more services than are needed or at rates in excess of fair market value
    - Management fees that fail to cover the full cost of services furnished to a referral source
    - Extravagant gifts or entertainment (Super Bowl tickets, cruises, jewelry, etc.)
- Improper inducements may be indirect, such as a payment or concession made to a third party with the expectation that it will be passed on to a referral source. Even the mere offer of a kickback or improper inducement could be a violation of law and could subject you and the Company to criminal prosecution.
- Encompass Health will evaluate the financial and ownership interests maintained by referral sources to ensure that applicable agreements are executed and referrals are monitored.

Policy cross-reference

Home Office

Compliance 304-Contracting for Physician Clinical Services or Ancillary Services with Referral Sources

Compliance 301-Contracting for Physician Medical and Program Direction Services as well as Physician On-Call Services

Compliance 303-Hospital Outpatient Clinic Models and Leasing Arrangements

Compliance 302-Leasing Arrangements with Referral Sources

Compliance 201-Free or Discounted Local Transportation of Patients

Compliance 410-Compliance with Federal and State False Claims Acts (including Whistleblower Protection)

Hospital (HPOD)
Compliance 304-Contracting for Physician Clinical Services or Ancillary Services with Referral Sources

Compliance 301-Contracting for Physician Medical and Program Direction Services as well as Physician On-Call Services

Compliance 303-Hospital Outpatient Clinic Models and Leasing Arrangements

Compliance 302-Leasing Arrangements with Referral Sources

Compliance 201-Free or Discounted Local Transportation of Patients

Compliance 410-Compliance with Federal and State False Claims Acts (including Whistleblower Protection)

Q&A

A former patient is seeking admission to an Encompass Health Rehabilitation Hospital. She lives locally, but cannot drive and has no one who can give her a ride. Can Encompass Health pay for a taxi to bring her to the hospital?

Yes, provided the following conditions are met: (1) the distance does not exceed 25 miles for an urban area or 75 miles for a rural area; (2) the transportation services are not to be offered to any patient prior to the patient's decision and selection to come to an Encompass Health Hospital; (3) the services are not advertised or marketed; and (4) the services are not air, luxury or ambulance-level transportation. Any exceptions to these requirements must be approved by the hospital's CEO or Controller or, in some instances, the ethics and compliance department.

Q&A

Our medical director wants to lease an office from our hospital part-time for two years. Can we do that?

Yes, provided that it is pursuant to a written agreement that details the space to be leased, the schedule, and the amount to be paid, the amount is deemed to be within fair market value for the space, and the agreement is commercially reasonable.

Our medical director is paid for her services and she refers patients to our hospital. Is this a violation of the Stark Law and Anti-Kickback Statute?

No. The medical director is paid for the administrative services she provides to our hospital, not for referrals. Our medical directors have contracts which are specifically structured to comply with the Stark Law and Anti-Kickback Statute. These regulations require that these contracts be in writing and that the compensation be fair market value among other things.

STANDARD: We safeguard the environment.

We comply with laws that safeguard the environment and promptly address any situation that results in the unauthorized discharge or emission of pollutants into the air, ground or water. We also follow the laws for storing, handling and disposing of hazardous materials, gases, chemicals and bio-wastes.

Key points to remember

- A company that violates environmental laws may be subject to heavy fines and other penalties. Covered Persons who knowingly violate environmental laws are subject to criminal sanctions, including heavy fines, penalties and imprisonment.
- Follow all applicable laws for storing, handling and disposing of hazardous materials, gases, chemicals and waste.
- If you learn of a dangerous or hazardous environmental condition, report it immediately to your supervisor or manager, facilities management department or the Hotline (888.800.2577).

Policy cross-reference

Home Office
Plans 180-Safety Plan

STANDARD: We support the communities in which we provide care.

We are committed to mitigating the impact of systemic racism, gender disparity and other structural disadvantages that impact the health of individuals in the communities in which we serve. We identify social determinants of health and collaborate with national and local organizations that share our mission of eradicating health inequities as well as social injustices and educational deficits. We engage in robust partnerships with agencies that support marginalized populations in our workforce and communities, and invest in programs that support our commitment to diversity, inclusion and equity.

Key points to remember

We have adopted a multi-pronged approach to attack the social injustices and racial disparities that impact the health of individuals in the communities in which we serve.
This includes partnering with educational institutions, trade organizations, social service organizations and other entities that are committed to achieving social equity.

Other resources to help you

APPENDIX A: QUICK REFERENCE GUIDE

Ethics & Compliance Department

Healthcare Regulatory and Business Ethics Issues

Dawn Rock-Tremble
Senior Vice President &
Chief Compliance Officer
205.970.5900
Fax: 205.970.4854
dawn.rock@encompasshealth.com

HIPAA Privacy Concerns
Eugena Goldman
Privacy Officer
205.970.3441
Fax: 205.970.4854
privacy@encompasshealth.com

Ethics & Compliance Hotline:
888.800.2577
encompasshealth.mycompliancereport.com



Legal Services

Legal Questions and Concerns

Patrick Darby
Executive Vice President, General Counsel
& Corporate Secretary
1.800.765.4772

Human Resources Department

Workplace Issues and Concerns

Tony Hernandez
Chief Human Resources Officer
1.800.765.4772
humanresources@encompasshealth.com

Internal Audit & Controls

Financial Reporting/Tax/Internal Control Issues

Dean Taggart
Inspector General
1.800.765.4772
internalaudit@encompasshealth.com

Internal Audit & Controls Hotline:
1.800.755.8215

Information Technology Group (ITG) – Security

Data Security (e.g., phishing, spam, viruses, ransomware, cybersecurity)

Ernie Pritchard
Vice President, Chief Security Officer
1.800.765.4772

ITG – Support Center Technology Help Desk

1.800.646.9404
support.encompasshealth.com

Quality & Clinical Excellence

Patient Quality of Care

Mary Ellen DeBardeleben
National Director, Quality
1.800.765.4772

Clinical Research Review Committee

Human Subject Clinical Research

Kendra Metcalf
Clinical Program Specialist
1.800.765.4772

Finance Department

Government Filings and Reporting; Financial Integrity

Doug Coltharp
Executive Vice President,
Chief Financial Officer
1.800.765.4772

Marketing and Communications

Media Inquiries and Social Media

Edward Bateh
Vice President,
Marketing and Communications
1.800.765.4772

Accounting Department

Asset Management and Accounting

Andy Price
Chief Accounting Officer
1.800.765.4772

Governmental Affairs

Legislative Affairs and Public Policy

Andrew Baird
Senior Vice President
Public Policy, Legislation & Regulations
1.800.765.4772

Risk Management

Patient, Employee and Visitor Safety

Jordan Butler
National Director
Professional & Employee Risk Management
1.800.765.4772

APPENDIX B: SUMMARY OF THE FEDERAL LAWS RELEVANT TO OUR INDUSTRY

*(**NOTE**: this is not intended to be an exhaustive list of relevant laws under which Encompass Health operates)*

- Title XVIII of the Social Security Act – Health Insurance for the Aged and Disabled (Medicare)
- Patient Protection and Affordable Care Act – Pub. L. No. 111 – 148, 124 Stat. 119
- False Claims Act – 31 U.S.C. §§ 3729-3733
- Anti-Kickback Statute – 42 U.S.C. § 1320a-7b(b)
- Physician Self-Referral Law ("Stark Law") – 42 U.S.C. § 1395nn
- Exclusion Statute – 42 U.S.C. § 1320a-7
- Civil Monetary Penalties Law – 42 U.S.C. § 1320a-7a
- Applicable Privacy and Security Rules of the Health Insurance Portability and Accountability Act of 1996 – 42 U.S.C. § 1320d – 2; 45 C.F.R. Part 160 and Subparts A & E (Privacy) and A & C (Security) of Part 164
- Applicable sub-regulatory guidance produced by the Centers for Medicare and Medicaid Services (CMS), the U.S. Department of Health & Human Services (HHS), and other appropriate regulatory bodies, to include manuals, training materials, guidance memos, and similar resources

Encompass Health®

Approved by the Encompass Health Board of Directors on October 20, 2026.

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