## **CODE OF ETHICS**

The Board of Directors of HEALTH CARE INCENTIVES IMPROVEMENT, INC (HCI3) has adopted this Code of Ethics and Conduct for the Organization to affirm its commitment to the highest ethical standards.

The policy of HCI3 is to comply with all governmental laws, rules and regulations applicable to its business and mission.

Directors, Officers and Employees recognize that the chief function of HCI3 is to serve the best interests of its constituency as reflected in its Mission Statement. Its programs should effectively and efficiently work toward achieving that aim.

HCI3's Board, Officers and Employees shall act in the Company's best interest, rather than in furtherance of personal interests or the interests of third parties. The Company has adopted a Conflict of Interest Policy to which all Directors, Officers and Employees must subscribe.

The Company cares how results are obtained in its business not just that they are obtained. Directors, Officers and Employees shall deal fairly with each other and with the Company's vendors, customers and third parties.

The Company expects compliance with its standard of integrity throughout the Organization and will not tolerate violations of the law or unscrupulous dealings.

It is the Company's policy that all transactions will be accurately reflected in its books and records. The Company expects candor from Employees, at all levels, and adherence to its policies and internal controls.

It is the Company's policy to make full, fair and accurate disclosure and reports and documents that it files with the Internal Revenue Service and other governmental agencies, as well as in reports to partners and the general public.

It is the Company's policy that any employee can and should bring complaints and concerns about the actions of any other employee, consultant or independent contractor to whom he or she reports, to the attention of the Executive Director or to any member of the Board, which complaints and concerns will be investigated in a fair and impartial manner, without recriminations to the reporting employee.