



EC-102 Responsible Business Conduct Policy

SECTION:

General Policies

SCOPE:

This policy applies to all employees associated with Elevate Care International (ECI) and its affiliated brands (Comfort Keepers, Prestige Nursing and Care, The Good Care Group, Oxford Aunts).

OWNER:

CCO/CHRO

PURPOSE:

The Company is committed to improving the quality of life of our employees and all whom we serve by providing high-quality, compassionate care to our clients while upholding the highest standards of Responsible Business Conduct. This policy outlines our dedication to ethical, legal, and socially responsible practices in all aspects of our operations.

POLICY:

Core Principles

The Company adheres to the following core principles:

- **Quality Care:**
 - We are committed to delivering the highest quality care that prioritizes the health, safety, and well-being of our clients.
- **Integrity and Transparency:**
 - We conduct all our activities with integrity, honesty, and transparency, both in our interactions with clients and in our business operations.
- **Respect and Dignity:**
 - We treat all clients, employees, and stakeholders with respect, dignity, and empathy, recognizing and valuing their diversity.
- **Compliance:**
 - We comply with all applicable laws, regulations, and industry standards governing the Home Care industry.





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Client-Centered Care

- Personalized Care:
 - We develop personalized care plans that address the unique needs and preferences of each client.
- Privacy and Confidentiality:
 - We protect the privacy and confidentiality of client information, ensuring that all client records are secure and accessible only to authorized individuals.
- Informed Consent:
 - We obtain informed consent from clients or their authorized representatives for all care services provided.

Fundamental Human Rights

- Fair Employment Practices:
 - We provide a safe, supportive, respectful, diverse and inclusive, and discrimination-free work environment that adheres to all labor laws and regulations.
- Training and Development:
 - We invest in the training and professional development of our employees to ensure they provide the highest level of care.

Responsible Operations

- Supplier and Partner Relationships:
 - We partner with suppliers and contractors who share our commitment to responsible business conduct and ethical practices.

Reporting and Accountability

- Reporting Concerns:
 - We encourage all employees, clients, and stakeholders to report concerns related to Responsible Business Conduct without fear of retaliation via our Speak-up portal (review Speak-up policy (EC-111)).
- Investigation and Resolution:





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- We will promptly investigate all reported concerns and take appropriate corrective actions when necessary.

Monitoring and Compliance

- Internal Reviews:
 - The company performs periodic risk assessments and audits to identify areas of exposure and prioritize mitigation efforts. Compliance requirements are translated into documented policies, procedures, and operational controls, which are reviewed and updated on a defined schedule or when regulatory changes occur. Identified gaps are documented, tracked, and remediated through corrective action plans with defined timelines and accountability. Training and awareness programs are provided to employees.
- External Compliance:
 - We cooperate with relevant regulatory authorities and industry bodies to ensure compliance with all applicable laws and regulations.

Community Engagement

- Community Support:
 - We actively engage with and support our local communities through charitable activities and community development initiatives.

Commitment to Continuous Improvement

- Policy Review:
 - We regularly review and update this RBC policy to reflect evolving ethical, social, and environmental considerations.

Implementation and Communication

This RBC policy will be communicated to all employees, clients, partners, and stakeholders. It is integrated into our daily operations and serves as a guiding document for our Responsible Business Conduct practices.





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RESPONSIBILITIES:

Employee: Employees are required to be familiar with and comply with this policy. The Company expects employees to report any possible violations of this policy to one’s supervisor or as otherwise provided in this policy.

Management: Managers are required to be familiar with and comply with this policy. Management is responsible for consistent and appropriate enforcement of compliance and consistent and appropriate discipline associated with non-compliance. It is also the responsibility of Management to ensure there are no retaliatory actions as a consequence of an employee reporting a concern and/or any possible violation of this policy.

Human Resources: Human Resources representatives are responsible for being familiar with this policy in order to provide appropriate guidance and to take appropriate action when violations of policy are reported.

Date Updated	Updated By	Section(s) Updated	Summary
11/1/2023	S.Kochar	Draft of all sections	Creation of Document
01/27/2025	S.Kochar	Updated scope and footer to reflect ECI entities. Updated Policy Owner from Ethics and Compliance Director to CCO/CHRO.	Policy Updated
02/03/2026	S.Kochar	Updated scope and footer to reflect current ECI entities. Updated section on Internal Reviews to reflect risk assessment, action plans and employee training.	Policy Updated

