

## CODE OF ETHICS

Elohim will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

For your information, Elohim's whistleblower policy is as follows:

Employees are encouraged, in the first instance, to address such issues with their managers or Director of Operations, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or Director of Operations, Elohim's President/Owner does operate with an open-door Policy.

### **Set Tone at the Top**

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavior expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code Work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Elohim, we want the ethics dialogue to become a natural part of daily work.

## **Uphold the Law**

Elohim's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our Specific roles. If we are unsure of whether a contemplated action is permitted by law or Elohim policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Because of the nature of our Business, some legal requirements warrant specific mention here.

## **Competition**

We are dedicated to Ethical, fair and vigorous competition. We will sell Elohim products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Elohim or the sales of its products or Services, nor will we engage or assist in unlawful boycotts of particular clients.

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### **Proprietary Information**

It is important that we respect the property rights of others, we will not acquire or seek to acquire improper means of a competitors trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

## CODE OF ETHICS

### Selective Disclosure

We will not selectively disclose (whether in one-on-one, small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Elohim, its securities, business operations, plans, financial conditions, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to clients to ensure that our presentations do not contain material nonpublic information.

### Staffing

We will treat all applicants and employees with dignity and respect, and provide equal employment opportunities, based on bona fide job qualifications, without regard to race, color, religion, national origin, sex, age, disability or any other classification protected by law.

Elohim will explain to field staff, prior to assignment, their wage rate, applicable benefits and hours of work.

It is essential to promptly pay any wages and benefits due in accordance with the terms of the individual's employment. We will satisfy applicable employer obligation, such as payment of employer's share of social security, state and federal unemployment insurance taxes and workers' compensation; and explain to employees that the staffing firm is responsible for such obligations.

Elohim will ensure that employees are assigned to worksites that are safe, that they understand the nature of the Work the clients has called for and can perform such work without injury to themselves or others and they are provided orientation to the facility.

We will take prompt action to address employee question, concerns or complaints regarding unsafe work conditions, discrimination or any other matter involving terms and conditions of their employment.

### **Conflicts of Interest**

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our job. At times, we may be faced with situation where the business actions we take on behalf of Elohim may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for Elohim. We owe a duty of Elohim to advance its legitimate interests when the opportunity to do so arises. We must never use Elohim property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Elohim.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member)by, or acting as a consultant to a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Elohim.
2. Directly supervising family members or closely related persons.
3. Owning or having a substantial interest in a competitor, supplier or contractor.
4. Having a personal interest, financial interest or potential gain in any Elohim transaction.
5. Placing company business with a firm owned or controlled by an Elohim employee or his or her family.
6. Accepting gifts, discounts, favors or services from a client/potential client, competitor or supplier, unless equally available to all Elohim Employees.

Determining whether a conflict of interest is not always easy to do. Employees with conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the director of Operations.

## **Gifts, Gratuities and Business Courtesies**

Elohim is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Elohim was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, Entertainment or other benefits from persons or companies with whom Elohim does or may do business. We will neither give nor accept business inducements that would violate law, regulation or policies of Elohim or Clients, or would cause embarrassment or reflect negatively on Elohim's reputation.

## **Accepting Business Courtesies**

Most business courtesies offered to us in the course of our employment are offered because of our positions at Elohim. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Elohim to

obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and goodwill with the firms that Elohim maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the Company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Elohim is involved in choosing or



confirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Elohim business.

### **Gifts**

Employee may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- - Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- - Gifts of nominal value such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Elohim does business. Tangible gifts (including tickets to a sporting or entertainment event that have a market value may not be accepted unless approval is obtained from management.

Employees with question about accepting business courtesies should talk to their managers or the director of Operations.

### **Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this code and raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the code, we must contact the Director of Operations.

Elohim takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

### **Be Loyal Confidential and proprietary Information**

Integral to Elohim's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, clients and other business partners, confidential and proprietary information about other companies, including current or potential suppliers and suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

### **Use of Company Resources**

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Elohim are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copies and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company- request support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Elohim Network and our fellow employees, Elohim reserves the right to monitor or review all data and information contained on an employee's Company-issued computer or electronic device, the use of the internet or Elohim intranet. We will not tolerate the use of Company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of Company resources should be directed to your manager.

### **Media inquiries**

From time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the director of Operations. No one may issue a press release without first consulting with the Director of Operations or President/Owner.

### **Name Tags**

Name tags are mandatory and are furnished for identification Purposes at work. Residents and family appreciate the help in learning your name. Report lost name tag promptly.

### **Attendance Guidelines**

It is your responsibility to notify the office of your availability for work. Each employee's work is vital for us to provide excellent level of care for which Elohim

Medical staffing agency is known for. As an employee you are expected to be dependable. If you are going to be late to an assigned shift, you are to either call the office or the nursing facility you are assigned and let them know as soon as possible. Also be aware that the facilities assigned frequently call the office if the staff is missing or late.

A good attendance is expected; poor attendance is misconduct and is just cause for disciplinary action. If you are in your probationary period and are absent for one day without calling in, or if the reason for your absence does not qualify as an excused absence, you may be terminated without any warnings or other notices. If you have completed your probationary period, disciplinary action will be taken based upon your work record.

Repeated unexcused absence indicates that you are not interested in complying with our client's needs. You will be subjected to progressive disciplinary action for repeated violations. You will receive warning about your patterns of unexcused absence.

**Unexplained absence includes:** communicable disease, immediate family emergency or death of immediate family.

**Unexcused absence includes:** No sitter, I'm too tired or no transportation.

These lists are not all inclusive as to acceptable or unacceptable reasons for absence from a case. Also, Elohim Medical staffing agency Inc may use their discretion and request a physician's release before returning to work.

## Call in procedure

If it is necessary to be absent from work, you must give a **24-hour notice**, if possible. If not, you must call at least **four hours** prior to the beginning of your shift. Any calls after the four- hour limit will not be considered for an absence, and you will be expected to go to work. When calling, you must speak to staffing person. This does not mean leaving a message with the person who answers the telephone. You are to make all calls personally, except in an emergency.

Once you have agreed to an assignment, it is imperative that you be present for the assignment. Cancellations and tardiness will not be tolerated. Car trouble and babysitting conflicts are not acceptable reasons for cancellations. Please notify us as soon as possible if an emergency occurs so we can replace you.

**\*\*\* Call no show or frequent tardiness may result to minimum hours scheduling because you are not dependable.**

**ON CALL NUMBER: 515- 999- 7701**

## **DRUG AND ALCOHOL ABUSE**

The welfare and success of Elohim Medical and staffing depends upon the physical and psychological health of our employees. The abuse of drugs and alcohol poses a serious threat to both Elohim and our employees. A few of the more commonly abused or improperly used drugs and substances include alcohol, pain killers, stimulants, sedatives and tranquilizers: as well as illegal drugs such as marijuana, cocaine, heroin and other drugs. It is the responsibility of both Elohim agency and our employees to maintain a safe, healthy and efficient work environment. For this purpose, Elohim agency has adopted the following policies:

\*Elohim agency premises include the office, work locations, parking lots and any other means of transportation engaged in company operation.

1. Elohim Medical staffing agency prohibits employees and others working in our premises from reporting to work or from working with alcohol and drugs in their systems. Employees are required to report to work in an appropriate mental and physical condition for work.

2. The misuse of alcohol of alcohol and/or possession of, making of, handing out, buying, use or sale of unauthorized or illegal drugs, or the misuse of any legal drugs, on Elohim Premises or while on business, is prohibited and will constitute grounds for corrective measures including termination.

\* if there is reasonable suspicion that an individual is using or drug dealing, he/she will be required to undergo a drug test.

3. Employees under the influence of prescribed drugs or alcohol which, in Elohim opinion, impairs judgment, performance or behaviors while on Elohim

premises or business will be subjected to corrective measures up to and including termination.

4. Employees are responsible for promptly notifying their manager of any prescribed medication that may affect their judgment, behaviors, or performance.

Because the unlawful presence of illegal drugs or controlled substances in the workplace jeopardizes the health and safety of the Elohim staffing employee in violation of the above policy will be removed from the assignment and/or terminated from employment with Elohim Medical staffing agency

If you need help with a substance abuse problem, contact one of the organizations listed below. Representatives from these organizations will give you information regarding the counseling programs available locally. Discussions with these organizations will be kept confidential.

- National Cocaine Hotline 1-800-COCAINE
- National Institute of Drug Abuse Hotline 1-800-622-HELP
- Listing of organizations such as Alcohol Anonymous, Narcotics Anonymous and cocaine anonymous can be found in your local phone book under “Alcoholism” and “Drug Abuse”.
- Your local health department, mental health center, hospital or social service agency can also provide assistance for substance abuse problems.

If you have any questions regarding Elohim Medical staffing agency's policy on drug-free work environment, please contact the staffing director.

### **Do the Right Thing**

Several key questions can help identify situations that may be unethical, inappropriate, or illegal. Ask yourself:

“ Does what I am doing comply with the Elohim guiding principles, Code of Conduct, and company policies?

◆ Have I been asked to misrepresent information or deviate from normal procedure?

◆ Would I feel comfortable describing my decision at a staff meeting?

◆ How would it look if it made the headlines?

◆ Am I being loyal to my family, my company and myself?

◆ is this the right thing to do?

Your relationships with your clients are **professional**,

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_