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|  HANDLING ETHICS VIOLATIONS  | NO. 439 |
| POLICY:Winning Wheels and its affiliates strive to uphold the highest principles of ethical conduct including, but not limited to: facets of business (including controversial relationships), marketing, service delivery, professional responsibilities, and human resources. PROCEDURE:* Personnel and other relevant stakeholders will be educated on ethical codes of conduct, a summary of which will be reviewed at least annually.
* The Winning Wheels, Inc. organizational code of ethics stipulates that allegations of violations of its policies on ethical conduct should be immediately reported to the facility administrator at Winning Wheels at 815-537-5168 or to a member of the corporate management team at American Health Enterprises, Inc. at 815-778-3683.
* Reports, which may include waste, fraud, abuse, and other wrongdoing, may be made verbally or in writing.
* An Ethics Committee, including member(s) of the Winning Wheels Board of Directors, will be appointed and will fully investigate the allegation.
* A thorough and impartial investigation will be conducted by the appointed Ethics Committee and a response will be filed and any necessary corrections implemented within 30 days from receipt of the ethics violation allegation. The party filing the report will be notified of the results.
* Should there be reason to believe that the Code of Ethics has been violated, the appropriate Ethical Practice Board will be informed.
* Such violators may be subject to disciplinary action imposed by the employing organization, as well, and will be reported to the proper authorities, as indicated.
* Winning Wheels, Inc. shall cooperate fully with the appropriate Ethical Practice Board in its investigation and adjudication of matters related to this Code of Ethics.
* Reports of ethics violations by employees or other stakeholders may be made without fear of reprisal.
* Reasonable precautions are taken to protect the anonymity of those filing a complaint, as well as the individual who is the subject of the complaint. Advocacy efforts will be made for the persons served, as necessary.
* Winning Wheels, Inc. recognizes its responsibility towards corporate citizenship by promoting ethical business practices, advocating for persons served, and developing organizational efficiency.
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| Approved: | Effective Date:  6/96 | Revision Date:  5/05; 3/17 | Change No.: | Page: 1 of 1 |