



Do The Right Thing:

Ivy Rehab Code of Conduct



Table of Contents

We Do the Right Thing	01
CEO Intro	01
Our Mission, Vision, and Values	02
Who this code is for	03
Why This Code Matters	03
Manager Responsibilities	04
Speak Up and No Retaliation	05
Make the Right “ CALL ”	06
“Code-Word” Challenge:	07
For Our Patients and Teammates	02
Do the R-I-G-H-T Thing	07
Respectful Workplace	09
Data Privacy	13
Health and Safety	15
Teammate Growth — Your Growth at Ivy	16
With Honesty, Transparency, and Extreme Ownership	03
Our Work with the Government	18
Financial Integrity and Records Management	19
Responsible Billing	21
Fraud, Waste, and Abuse	23
When Using Information and Technology	04
Our Information and Assets	25
Intellectual Property	27
Responsible Communications and Social Media	28
When We Uphold Our Standards	05
Competing Fairly	30
Anti-Kickback	31
Gifts and Entertainment	33
Conflicts of Interest	34
Our Work with Third Parties	35
It’s All Connected – Conclusion	06
Thank You from Our CCO and General Counsel	38



We Do the Right Thing

A message from Jason Strauss, CEO



At Ivy, we're united by a simple but powerful mission: to inspire and enable people to live life to the fullest. That's not just about the care we provide — it's about how we show up for each other, every day.

This Code of Conduct exists to help guide our actions and decisions. It's rooted in our mission, vision, and values, and built around the idea that doing the right thing isn't optional — it's who we are. Every teammate, in every role, plays a part in keeping Ivy a place of integrity, excellence, and respect.

Our value "Do the Right Thing" anchors this Code. It reminds us to hold ourselves to the highest standards, to act with honesty, and to speak up when something doesn't feel right. Because when we live our values, we strengthen the trust our patients, partners, and teammates place in us.

The Code is about Ivy's character, our privilege of healing patients, and serving our communities. It's what allows us to continue delivering exceptional care and building something meaningful—together.

Let's keep doing the right thing, for the right reasons, and keep enabling people to live their lives to the fullest along the way.

Our Mission, Vision, and Values



Ivy's Mission

Personalizing Therapy.
Empowering Teams.
Living Life to the Fullest.



Ivy's Vision

To be the world's trusted partner
in therapy, redefining what is
possible at every stage of life.



Ivy's Values

- One Ivy
- Do the Right Thing
- Grow
- Get the Right Stuff Done
- I Belong
- Love What You Do
- Serve Others

Why We Have a Code and How We Use It

Our Code serves as a resource to help us make the right choices and stay true to our values. Everyone who works at Ivy — including all teammates, directors, affiliated healthcare professionals, and anyone who performs services on Ivy's behalf — has a responsibility to understand and follow the Code in everything we do.

Everyone who represents Ivy must uphold our high ethical standards. Our shared commitment to following our Code strengthens our team and sets a foundation for our respectful workplace. We're all responsible for acting and making decisions that align with our values. And, in situations where behaviors don't reflect our Code, we'll work together to engage in constructive conversations and implement appropriate measures to realign with our standards.

In serious cases, this could result in disciplinary action or a review of continued employment. If you ever have questions, don't hesitate to ask for guidance.

Our Code covers a wide range of business practices; however, it does not cover every issue that may arise. When appropriate, it's important that we all consult additional resources, such as our Ivy company policies on the intranet, when we need guidance on a specific topic. If still unsure, teammates can submit a ticket to our friendly support teams with their inquiry.

There are some regions where additional legal or regulatory requirements may apply. In these cases, Ivy may provide supplementary Codes of Conduct or policies that address region specific requirements (for example, those related to New York State Medicaid). If you work in an area with additional compliance obligations, we expect you to understand and follow those requirements.



High-Fives All Around:

- Every voice matters and you belong.
- We put our people first.
- We're honest in everything we do.
- We rely on each other to always do the right thing and ask questions if unsure.
- We keep information private and secure.
- Trust is the foundation of everything we do.
- We expect exceptional services from our third-party partners.

Who This Code Is For

This Code of Conduct applies to everyone who represents Ivy — not just full-time teammates. That includes:

- All Ivy teammates (clinical and non-clinical alike)
- Contractors, consultants, and temporary workers
- Affiliated healthcare professionals
- Third parties, vendors, and business partners acting on Ivy’s behalf
- Board members and executive leadership

If you perform work for or with Ivy, you are expected to understand and follow the standards outlined in this Code.

Why? Because doing the right thing isn’t just a teammate expectation — it’s how we build trust across every relationship, protect our reputation, and uphold our mission. When we all hold ourselves to the same high standards, we strengthen the entire Ivy community — including the patients, families, and partners who rely on us every day.

Why This Code Matters

Clinical excellence, engagement, and compliance are genuine emphases at Ivy. The Code of Conduct provides a roadmap to setting the tone and living up to the expectations. By following the Code, you naturally provide exceptional patient and teammate experiences, ensuring responsible behavior, nurturing belonging, and creating an honest environment. It is more than compliance. It is about how we treat one another and enabling our teammates and patients (and their caregivers) to thrive and live their lives to the fullest.

We are proud of Ivy’s culture of compliance. Our patients, partners, Board, investors, regulators, and the world expect us to lead by example, deepen that culture, and to be proactive.





Manager Responsibilities



Managers: we’re counting on you to set the tone for your team to Do the Right Thing.

Your actions help shape our culture, and teammates look to you for guidance. As a leader at Ivy, we’re relying on you to lead by example, model responsible behavior, and create an environment where teammates feel comfortable bringing their questions and concerns to you.

We expect you to understand the expectations outlined in our Code so you can help your team members follow them.

If you see or hear about conduct that may not be consistent with our Code, policies, or the law, you are required to report it.

Your Role is to Make Compliance Second Nature.

Speak Up and No Retaliation

All of our teammates should feel comfortable speaking up when they have concerns. Whether it’s a potential concern about behavior or actions that are inconsistent with our Code, policies, or the law, reporting concerns helps Ivy address matters before they become bigger issues. The sooner we learn about teammate concerns, the faster we can address them together as One Ivy.

We count on each other to maintain our culture of integrity and to have the courage to speak up with concerns. To do so, you can reach out to the following resources:

- Your direct Manager, Regional Director, Human Resources Business Partner, Operational Leadership, Chief People Officer, or directly to the Compliance team.
- You can submit an incident report form to the Legal and Compliance teams.
- You can also anonymously report compliance matters through our secure and anonymous third-party reporting service, available 24/7.
 - **Website:** lighthouse-services.com/ivyrehab
 - **Email:** reports@lighthouse-services.com
 - **Call:** English: (855) 644-1444 | Spanish: (800) 216-1288
 - **App:** “Anonymous Reporting” | Keyword: ivyrehab
 - **Fax:** (215) 689-3885



Speaking up isn’t always easy. It takes courage to Do the Right Thing, and Ivy takes the concerns you share seriously. We review all reports, investigate as needed, take appropriate action, and keep the process as confidential as possible. We may not always be able to update you on the actions taken as a result of your report, but please be assured that Ivy takes all reported matters earnestly and takes action. We hear you.

We do not tolerate any form of retaliation against anyone who speaks up with good faith concerns. Retaliation is not only against our Code — oftentimes, it’s against the law.

Let’s be the force for good.



Make the Right “CALL”

If you are faced with an ethical dilemma or a difficult decision, you can pause and reflect on how to Make the Right “CALL”:

- C

Clarify
Make sure you understand the situation at hand.
- A

Ask yourself...
 - Is this the right thing to do for our patients, my teammates, and for Ivy?
 - Are my actions in line with our Ivy values and the standards of integrity outlined in our Code or other guidelines?
 - Am I acting in accordance with our Ivy policies and the law?
 - Would I feel comfortable explaining this decision to my manager — or to a patient?
 - Would my decision impact Ivy’s reputation?
- L

Look to our Code, policies, or our other legal and compliance resources for guidance.
- L

Live our Ivy values!

If you are unsure, it may be helpful to talk through these questions and your concerns with your manager or one of our other available legal or compliance resources.

Don’t roll the dice, come to Legal or Compliance for advice!

We are here to support you — it isn’t always easy to Do the Right Thing, but it’s always the right choice.



“Code-Word” Challenge: Do the R-I-G-H-T Thing



You’ll see that the theme, “Do the Right Thing,” appears many times throughout the Code. It’s more than just one of our Ivy values — it’s also a simple reminder to guide our choices and actions every day.

As you explore our Code, keep an eye out for the **green-highlighted** words that spell our “Code Word” R-I-G-H-T. Once you’ve found all five, send them to the Compliance team for recognition!



For Our Patients and Teammates

Patient Rights and Dignity

At Ivy, we treat all individuals with **respect**. This is true not only for how we interact with each other — but also for how we interact with our patients and their caregivers. Our patients trust us with their health and deserve to be treated with compassion and dignity at all times. At Ivy, it’s all about the people!



Doing the right thing means warmly greeting each patient every time they arrive,

actively listening to their concerns and goals, and creating individualized treatment plans. It also means to go that extra mile if needed to ensure patients feel safe, heard, and supported.”

Michelle Griffiths
Regional Director, Mid-Atlantic



Put our patients first: treat all patients with respect, professionalism, and kindness — always.



Protect patient confidentiality, sharing information only when legally appropriate.



Communicate clearly, honestly, and in a timely manner with patients.



Report any behavior towards the patients that is inconsistent with our Code.



Make the Right Call:

We believe that the heart of healthcare is in our connections, and we build trust every time we interact with our patients and their caregivers. They believe in us and our services.

Ask yourself...



Am I helping my patient make informed decisions by providing them with clear and accurate information?



Am I actively listening to my patient and their caregivers, and considering their concerns with empathy and respect?



Am I providing the level of compassion and care I would want for myself, or for one of my loved ones?

One Ivy

Never settle for anything short of an exceptional patient experience. At Ivy, we build trust by listening to patient concerns and making sure they feel valued, safe, and involved in their own care. When we put our patients first, we build stronger relationships, reinforce trust, and create an environment where they feel heard and respected.

Respectful Workplace

At Ivy, there is no place for the mistreatment of each other, and we are proud of the culture we have built here. We do not tolerate harassment, discrimination, or bullying of any kind, including harassment based on protected characteristics. We also expect this same commitment from everyone who works with us or on our behalf.

How we do the right thing:



Treat everyone with respect and professionalism — always.



Recognize — and promptly report — any inappropriate behavior in the workplace.



You have the added responsibility to act if you witness or become aware of harassment.



Make employment-related decisions based on an individual's skills, performance, and qualifications — not on personal or protected characteristics unrelated to the job.

Get the Terms Right:

What is harassment?

Harassment is any offensive or unwanted behavior based on race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, age, disability, genetic information or any other legally protected characteristic. Harassment can take on many different forms, including words, actions, and gestures that create an uncomfortable or hostile environment.

What is discrimination?

Discrimination means treating someone unfairly or differently based on certain legally protected characteristics, including those described above. For example, refusing to hire someone just because they are older than the rest of the team is discrimination.

One Ivy

When we treat each other with respect, we all win. We Do the Right Thing when we respect and support each other, so that we can maintain a positive environment where everyone can do their best work and live their lives to the fullest.



Our Culture of Diversity, Belonging, and Inclusion

We believe our strength begins with each individual teammate. Together, we create a supportive environment that encourages growth and collaboration. Our greatest strength lies in the talents and abilities of our teammates. Our different backgrounds, perspectives, and experiences can help us make a positive impact on our patients and the communities we serve.

How we do the right thing:



Respect the opinions, experiences, and beliefs of your patients and teammates — even if they are different from your own.



Be welcoming and never intentionally exclude others from normal workplace conversations and interactions.



Be receptive to the contributions and ideas of your teammates.



Speak up if you feel that someone is being mistreated or disrespected.

Make the Right Call:

There are subtle ways that we can show our teammates that we care about each other and appreciate each other’s differences. When we consider how our behavior affects those around us, we create an environment where everyone feels heard and valued.

Ask yourself...



Am I encouraging my teammates to share their perspectives — and letting them know that I value their ideas?



Am I listening to everyone’s perspectives and contributions?



Am I considering every team member’s work schedule or time zone when I am planning a meeting?

One Ivy

At Ivy, every voice contributes to our success. We live our company value “I Belong” when we embrace our different backgrounds, thoughts, and experiences — uniting as one.



High-Five Moment:

We respect the beliefs and opinions of our patients and teammates, because every voice matters. Listening to each other makes our team stronger! High five — you belong!



Data Privacy

We respect and protect the privacy of everyone we work with — whether it is information about our teammates, or the information that our patients provide. Every day, regardless of our roles, we handle sensitive personal information, including Personally Identifiable Information (PII) and Protected Health Information (PHI). We must comply with all laws, regulations, and policies that govern how sensitive information is collected, used, and shared. By handling personal data with care, we protect patient trust, maintain compliance, and uphold our commitment to ethical care.

How we do the right thing:



Use data only for the purpose for which it was collected originally.



Use secure channels for sharing sensitive information (e.g., encryption).



Keep personal information private: only access personal information for legitimate business reasons, and never share it with unauthorized individuals or discuss it in public places.



Understand that respecting our patients’ right to privacy means we cannot answer questions related to patients from friends, relatives, or the media without written authorization.



Access patient charts only when necessary. Viewing patient records without a valid work-related reason is a serious violation of privacy, company policy, and the law.



Report any concerns about errors, omissions, potential falsifications of patient records, or any other mishandling of personal information.



Always follow Ivy’s privacy policies and procedures and obtain signed HIPAA Authorizations if permitted to share patient information on social media (prior to posting).



Doing the right thing is hidden in the little actions every day.

For example, caring to preserve patient privacy and thinking twice before sharing their information verbally or electronically.”

Margarita Derelanko
Senior Director of Compliance, Privacy Officer

Get the Terms Right:

What is HIPAA?

The Health Insurance Portability and Accountability Act (HIPAA) is a federal law that protects patient privacy and controls how Protected Health Information (PHI) is used and shared. HIPAA requires healthcare providers, like Ivy, to keep patient information confidential and secure. Violations can result in serious financial and legal consequences.

What is PHI?

Protected Health Information (PHI) is any information that can be used to identify a patient and relates to their health, treatment, or payment for healthcare services. PHI can be found in many places, including insurance details and medical records. PHI is more than a medical diagnosis. Refer to our friendly resources on the intranet for more information.

What is PII?

Personally Identifiable Information (PII) is information that can be used to identify an individual. Examples include names, Social Security numbers, credit card numbers, birthdates, and email addresses.

One Ivy

By safeguarding personal information, we honor the trust and confidence our teammates and patients place in us. This is a critical part of what makes Ivy the provider, partner, and employer of choice in outpatient rehabilitation. We handle every entry, record, and conversation with care — not only because it is the law, but because we’re committed to treating every teammate and patient with the respect they deserve. You would want the same level of care when it comes to your information.





Health and Safety

We all deserve to feel safe when we come to work each day. We keep our workplace free from violence, weapons, drugs, and alcohol, so that our team can focus on providing the best service and care to our patients. We maintain a safe and healthy work environment and comply with the safety and health regulations that apply to our business. Managers are expected to know applicable health and safety regulations. We also expect everyone who works with us and on our behalf to share our commitment to maintaining a safe and healthy workplace.

How we do the right thing:



Do not engage in any threatening or intimidating behavior — and don't tolerate this behavior from others.



Never come to work — or conduct business on Ivy's behalf — while impaired by alcohol or any controlled substance.



Report any safety or health concerns as soon as possible.

It's All Connected: Focusing on What Matters

A safe and healthy workplace allows us to focus on what truly matters: our work, our patients, and each other. We're committed to a culture of safety, so that we create an environment where we can all thrive and focus on doing our jobs with confidence and care.

One Ivy

A safe and healthy work environment is about looking out for each other and speaking up if something doesn't feel right. It is all about the people!

Teammate Growth — Your Growth at Ivy

At Ivy, growth is part of who we are—whether it’s advancing professionally, personally, or expanding access to patient care through new clinical teammates, De Novos, or strategic partnerships. It’s at the heart of everything we do.

We’re deeply committed to our people and their continuous development. From mentorship and learning opportunities to specialization and partnerships, we empower teammates to shape their futures. Ivy provides clear **growth** paths and programs designed to elevate careers. Our investment in development includes Residency and Specialty Programs, a Clinical Career Ladder, Clinical Focus Teams, a robust Clinical Resource Library, Leadership Training, Mentorship Programs, Continuing Education, and our De Novo Partnership Program, which allows you to be an equity investor of your own practice in partnership with Ivy.

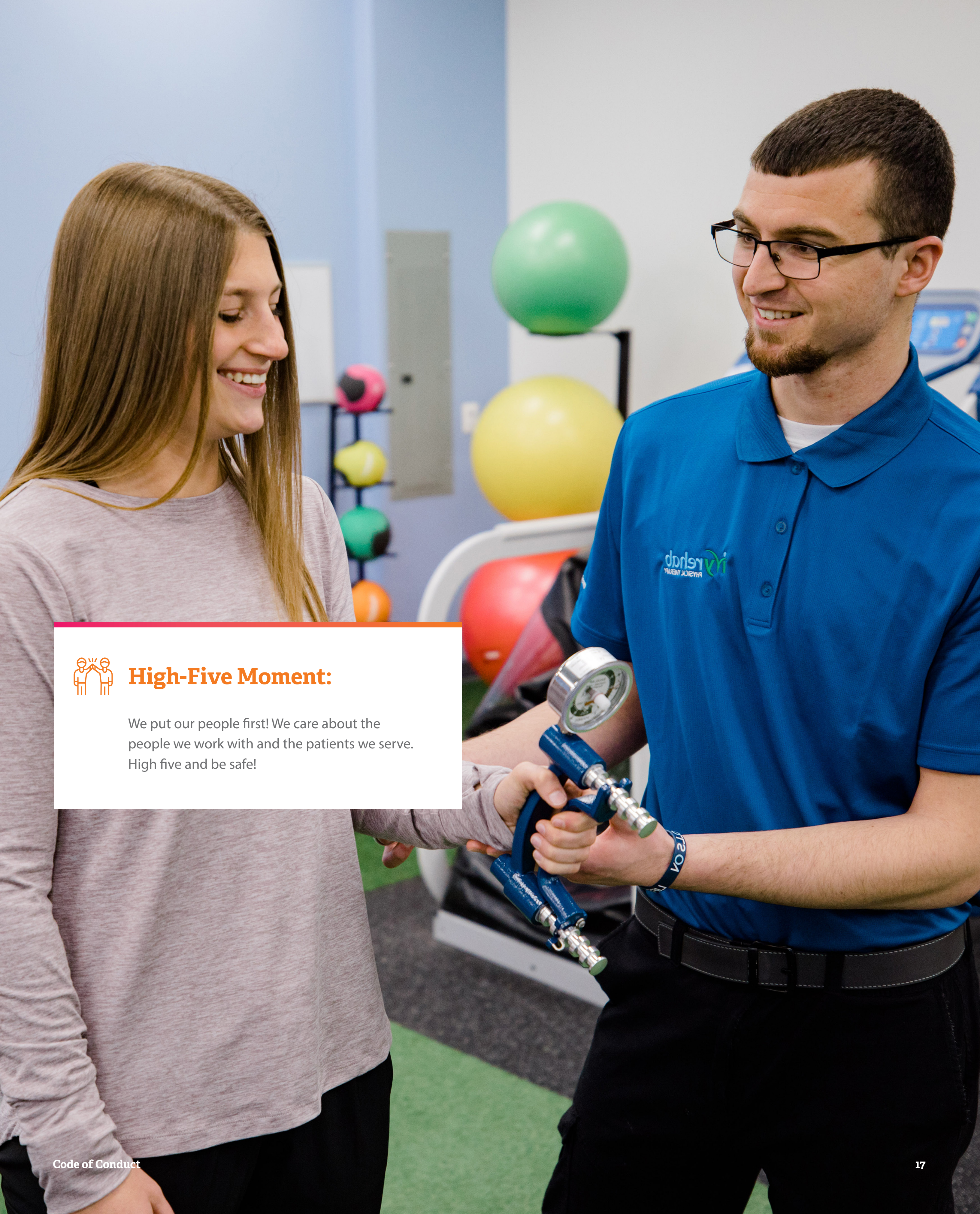


Doing the right thing means honoring the human side of change:

listening with empathy, communicating clearly, and ensuring our partners and future teammates feel respected, supported, and confident in their new chapter with Ivy.”

Lisa Otterbein-Bolek
Senior Director of Integrations, M&A





High-Five Moment:

We put our people first! We care about the people we work with and the patients we serve. High five and be safe!

With Honesty, Transparency, and Extreme Ownership

Our Work with the Government

Our work with government healthcare programs, like Medicare and Medicaid, is essential to providing care for our patients. We must follow the rules around working with the government, including billing, reimbursement, and financial interactions, to protect our ability to participate in these programs. Mistakes can lead to serious consequences, including financial and legal risks.

How we do the right thing:



Comply with all applicable laws and regulations when billing government healthcare programs, including Medicare and Medicaid.



Submit accurate and truthful claims, following all Ivy documentation policies and procedures.



Ask for or make a copy of identification from payer and government auditors, cooperate honestly and fully with government audits and investigations, document the audits, and notify your manager and AuditAlerts@ivyrehab.com should you receive any government inquiry.



Get the Terms Right:

Who is a government official?

A government official includes any employee or representative who works for or on behalf of a government agency (for example, individuals who oversee healthcare programs like Medicare and Medicaid). We’re all responsible for being honest and transparent when working with government officials and for complying with the regulations that apply to Ivy.

Financial Integrity and Records Management

Maintaining the trust of our patients, business partners, government agencies, and each other requires us to be honest and transparent when creating and handling business records. We maintain accurate and complete financial and operational records in compliance with the legal and regulatory requirements that apply to Ivy.

How we do the right thing:

-  Create accurate and complete records, documents, and disclosures – whether they are internal or external.
-  Never falsify records or ask someone to record information that you know is incorrect or not appropriately supported.
-  Follow all Ivy policies and legal requirements for maintaining, storing, and disposing of records. (This includes the rules around how long they must be kept and when they should be securely destroyed). Never share any financial information externally without gaining proper approval and signed NDA.

Make the Right Call:

Fraud is harmful to everyone and is inconsistent with our commitment to acting with **integrity**.

Ask yourself...



Has any information been concealed?



Is there a misrepresentation of facts — or pressure to make dishonest actions?



Is the information I am recording or reporting complete, appropriately supported and accurate?



Have I double-checked my work, to make sure I’m not unintentionally misrepresenting any information?

If you’re unsure about any of these questions, it’s best to double-check the details or ask for guidance before proceeding.

One Ivy

Our ability to participate in government healthcare programs allows our patients to access the care that they need and deserve. Acting with integrity — especially our work with the government — enables us to continue to provide care to those who depend on us.



High-Five Moment:

Being transparent about Ivy’s finances isn’t just a compliance requirement. We’re honest in everything we do — because it’s part of our culture. High five for being thorough and accurate!



One Ivy

Clear, honest, and accurate records help us make informed business decisions, comply with the legal requirements that apply to our business, and protect Ivy’s reputation and credibility. We handle our financial and business records responsibly, so we can continue to serve our patients and communities with confidence.

Responsible Billing

Billing for healthcare services is a key part of how we deliver ethical, high-quality care to our patients. Whether we’re submitting claims to private insurers, Medicare, Medicaid, or billing patients directly — every charge must accurately reflect the services we provided. Even small errors can lead to overbilling, and other serious legal and financial consequences.

How we do the right thing:



Submit claims that are accurate, truthful, and properly documented.



Bill only for services actually performed, documented in the patient’s medical record, and that patients truly need — remember, we always put people first.



Use the correct billing codes and follow reimbursement guidelines for government and private payers.



Never alter, inflate, or manipulate billing information to receive higher payments.





It’s All Connected: Protecting Our Patients

We bill responsibly and accurately to support the continued accessibility of healthcare and an accurate reflection of services provided, so that our patients can focus on their well-being and live life to the fullest — and not on unexpected costs. Errors or improper billing can lead to unnecessary financial burdens, delays in care, or loss of patient and payer trust in Ivy. Our patients deserve to know that they are being billed accurately and transparently for the services they receive from us.

One Ivy

We bill correctly to protect our patients, protect Ivy, and protect the trust placed in us. Patients and payers depend on us to bill correctly and honestly. We handle our billing with accuracy and integrity, so that we can help keep healthcare affordable and do right by the patients we serve.



Doing the right thing and creating the best life for all children:

It is putting in the time to learn a new skill. It is driving to a site that is farther away from home to care for patients whose therapist is sick. It is dressing up as Santa to give a parent a special Christmas memory. It is offering your time and talents. It is compassion. It is love.”

Sarah King
Regional Director, Southeast Pediatrics

Fraud, Waste, and Abuse

We are committed to using healthcare resources ethically and responsibly. Fraud, waste, and abuse don’t just lead to unnecessary costs — they can also violate the law and put patient care at risk. Laws like the False Claims Act and the Stark Law, as well as Ivy’s policies and procedures, help protect our patients from fraud, waste, and abuse. We all play a role in preventing fraudulent billing, improper referrals, and the misuse of government healthcare funds.

How we do the right thing:



Only submit accurate and truthful claims for reimbursement — never inflate, alter, or falsify billing information.



Only bill for services provided and that are medically necessary.



Avoid referring Medicare or Medicaid patients to entities in which we (or our family members) have a financial interest, unless an exception under the Stark Law applies. Contact Legal for guidance.



Understand that we must follow all applicable laws and regulations when working with government healthcare programs to prevent False Claims Act violations.



Report any suspected or actual fraud, waste, and abuse as soon as possible via the incident reporting process or the hotline.

Get the Terms Right:

What is the Stark Law?

The Stark Law (also known as the Physician Self-Referral Law) prohibits a physician from making a referral for “designated health services” to an entity in which they (or a member of their family) have a financial relationship. Physical therapy is a designated health service, so referrals must comply with Stark Law regulations.

Make the Right Call:

Fraud, waste, and abuse may not always be obvious — but even unintentional mistakes can lead to serious consequences.

Ask yourself...



Am I being asked to bill for services that weren’t actually provided?



Have I noticed a pattern of medically unnecessary services or treatments?



Could this referral or financial arrangement be seen as benefiting me or my family instead of the patient?



Would I feel comfortable explaining this billing decision to a patient or an auditor?

Still not sure? Consult Legal and Compliance for guidance.



High-Five Moment:

Healthcare is a highly-regulated space, and we rely on each other to always do the right thing and ask questions if you are not sure. High five if you come to Legal and Compliance for advice!





When Using Information and Technology



Our Information and Assets

We all benefit when we use our assets efficiently. Ivy’s information, resources, and property help us provide quality care and operate effectively. Whether it’s our company funds, equipment, technology, or confidential business information, we all must use these assets responsibly, so that we can keep our business running smoothly and deliver exceptional patient care.

How we do the right thing:



Keep confidential business information — such as financial data, pricing, contracts, and operational plans — secure. Only share it with authorized individuals.



Use Ivy’s assets for legitimate business purposes.



Safeguard any devices that contain confidential information or that connect to our information systems.



Speak up if we suspect a security risk, financial irregularity, or improper use of company resources.



Don’t click that suspicious link or open that attachment. If phishing or cybersecurity attacks are suspected, report them to IT.



Immediately report any lost or stolen assets to Ivy IT.

Get the Terms Right:

What is confidential and proprietary information?

Confidential and proprietary information is any information related to our business that is not yet available to the public. This includes our financial data, business strategies, sales figures, pricing policies, teammate information, or any other sensitive internal communications.

One Ivy

Our company’s information and assets allow us to do our jobs, serve our patients effectively, and grow as a business. When we protect our resources, use them wisely, and handle information responsibly, we help keep Ivy financially strong, secure, and well-positioned for the future for our teammates and patients.



High-Five Moment:

Doing the right thing means we use our company assets responsibly — always. Treat Ivy’s information and assets as if they were your own. High five for keeping our information secure!

Intellectual Property

Intellectual property (IP) is a valuable asset that helps set our business apart and gives Ivy a competitive edge in the market. Ivy’s IP includes all registered service marks (i.e. trademarks, trade names, logos, etc.). We safeguard Ivy’s IP and respect the IP rights of others.

How we do the right thing:



Protect Ivy’s IP, including our copyrights, trademarks, brand integrity, and proprietary information.



Comply with Ivy’s policies on sharing, distributing, or using IP to prevent unintentional leaks or misuse.



Use company software and technology responsibly, following licensing agreements and security protocols.

One Ivy

By handling our IP with care and using AI and other technologies responsibly, we protect our work, maintain our trustworthy reputation, and continue to drive future innovation in patient care.

Make the Right Call: Using Artificial Intelligence (AI)

In the course of your work, you may encounter AI tools that could appear helpful to your role. But, it’s important to vet these AI offerings and think about the potential risks to Ivy before using them.

Ask yourself...



Is this an approved AI tool to use at Ivy? If unsure, contact IT.



Could this AI tool expose Ivy’s data?



Am I inputting confidential information especially PII or PHI into an AI tool?



Am I putting our IP at risk?

Always get appropriate governance and management approvals before installing or using any AI tool on a company device, or before entering any company data into an AI platform. If you have any questions, reach out to IT, Legal, and Compliance for more information.

Responsible Communications and Social Media

What we say and how we say it, both in person and online, shape the way that the world views Ivy. Whether we’re sharing information with our teammates or posting on social media, our words have an impact on Ivy’s reputation and the trust we’ve built with our patients, our partners, and the public. We must communicate thoughtfully, respectfully, and in line with our values. Remember that our Code is not intended to interfere with, restrain, or prevent any employee communications regarding wages, hours, or other terms and conditions of employment.

How we do the right thing:



Remember that only authorized individuals may speak on behalf of the company. If speaking on behalf of Ivy or about Ivy practices, please contact the Communications team first.



Be clear when sharing personal opinions. (If you mention Ivy on social media, state that you are sharing your own views, and not speaking on behalf of the company).



Keep communication respectful, professional, and aligned with our values, both in person and online.



Never share sensitive or confidential company information on social media or in public spaces.

It’s All Connected: Communicating with Patients

Our communications significantly impact how our patients view us and the care we provide. We must always communicate thoughtfully. Social media is a powerful tool that can shape perceptions, so it’s crucial that our communications reflect a positive, professional image that aligns with our dedication to patient care. Ivy’s “People First” attitude is also about maintaining patient privacy whether on social media, in our clinics, or in public. Always follow Ivy’s HIPAA/privacy policies and procedures.



Do not befriend patients or have personal conversations with patients via social media.



Always obtain signed HIPAA Authorizations from patients and follow Ivy’s Social Media Policy when posting on personal or company accounts.

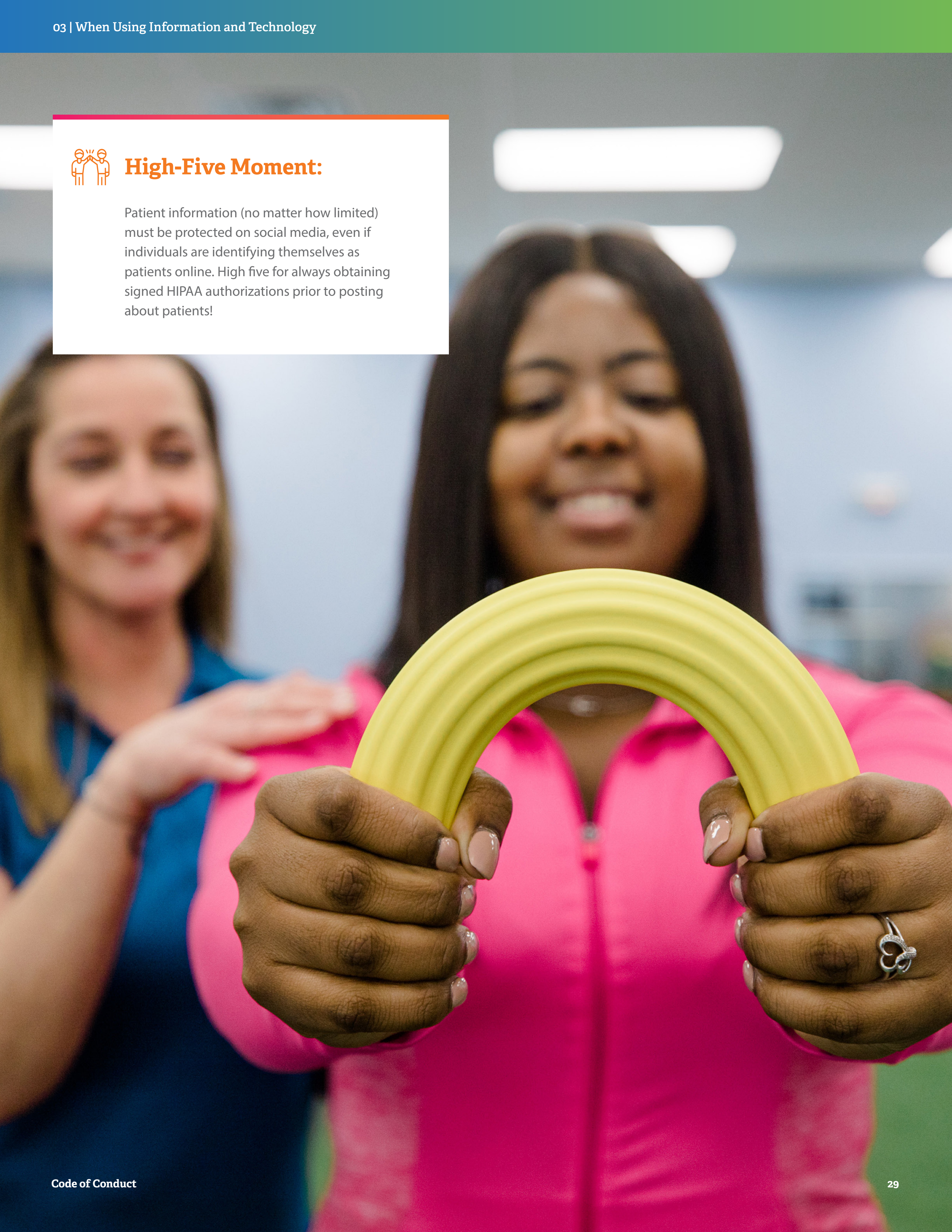
One Ivy

Social media is a great way to connect with our communities and showcase the great work that Ivy does. However, social media can also impact our reputation and expose us to other potential risks. That’s why it’s important for all of us to use good judgment and think carefully before posting online.



High-Five Moment:

Patient information (no matter how limited) must be protected on social media, even if individuals are identifying themselves as patients online. High five for always obtaining signed HIPAA authorizations prior to posting about patients!



When We Uphold Our Standards

Competing Fairly

At Ivy, we strive to be a provider of choice and compete on our merits, in line with the antitrust and fair competition laws that promote a fair marketplace. Healthy competition drives us to innovate and provide the highest quality services. We know anti-competitive behavior can harm our patients, damage our reputation, and lead to severe fines or legal penalties.

How we do the right thing:



Never share confidential business information with our competition.



Avoid conversations with competitors about Ivy’s pricing, patients, geographic areas, business operations, marketing efforts, confidential third parties/vendors, or future plans.



Be on guard during healthcare conferences and meetings. (Remember: even meeting with a competitor may give the appearance of anti-competitive behavior.)



Speak up if you see or suspect anti-competitive behavior.

It’s All Connected: Anti-competitive Behavior and Patient Choice

Anti-competitive behaviors, like price fixing and market allocation, are not only illegal — they ultimately harm our patients by limiting their choices and options for care. If a competitor raises topics like setting prices, restricting services, or dividing up patients or geographic areas, stop the conversation immediately and report it to Legal and Compliance.

If you are unsure: don’t roll the dice, come to Legal and Compliance for advice.

One Ivy

We succeed on our merits — not by restricting our competition or making secret deals. Competing fairly protects Ivy’s reputation for trustworthiness, strengthens our business, and allows us to put our patients first.



Anti-Kickback

Clinical excellence is driven by what is best for our patients — not financial incentives. We comply with the federal and state anti-kickback laws and the Stark law, which prohibit improper financial relationships that could influence medical decisions. It’s illegal to offer, accept or solicit anything of value in exchange for referrals for services paid by Medicare, Medicaid, or other federal healthcare programs. Not complying with these laws can have serious consequences: fines, exclusion from healthcare programs, and even criminal charges. Remember, Ivy may also be held responsible for the actions of third parties who work on our behalf.

How we do the right thing:



Never offer, accept, or solicit anything of value in exchange for a referral or the intent of a referral of services.



Never offer professional courtesies, waivers, or discounts for Ivy’s services to a referral source or their family members.



Always follow Ivy’s Gift policy and reimbursement procedures for any limited spend.



Never accept kickbacks from any third party.



Comply with all due diligence requirements when working with third parties.



Use caution and seek advice/approval from Legal and Compliance when engaging in transactions that involve referral sources.

Get the Terms Right:

What’s a kickback?

A kickback happens when a reward is offered for a favor. Kickbacks can include anything of value (not just cash) — including gifts, favors, referrals or other incentives that could be important to the other party.

One Ivy

Our patients trust us to make decisions free from any personal influence or financial incentives. Acting in the best interests of our patients is vital to maintaining their trust, and we do this by keeping our workplace free from any behavior that could compromise patient care or that trust.



High-Five Moment:

Trust is the foundation of everything we do.
We refuse to take shortcuts and we say no to
bribes — no matter what.



Gifts and Entertainment

Exchanging gifts and entertainment helps build positive working relationships. But, they can also influence — or even appear to influence — our ability to make decisions impartially. We apply strict rules in these areas, as appropriate to our work with government programs. Even when it’s appropriate to exchange limited gifts or entertainment, we still must use common sense.

How we do the right thing:

-  Avoid gifts or entertainment that could influence a business decision or create a sense of obligation.
-  Accept or offer only appropriate gifts and entertainment that align with our mission and values and Ivy’s Gift Policy. (Keep even appropriate exchanges infrequent, nominal in value, and never tie something to a business arrangement.)
-  Don’t ever give or accept cash or cash equivalents, including gift cards.
-  Never exchange gifts or entertainment with any federal or state government employee.

Make the Right Call:

Not sure whether it’s appropriate to accept or offer something? Ask yourself...

-  Is there a valid business objective?
-  Is this gift or entertainment in exchange for referrals?
-  Would I be comfortable if everyone at the company knew I accepted or offered this?
-  Does it hold the expectation of a reciprocal benefit?
-  Could this gift affect someone’s ability to be objective?
-  Could this reflect poorly on Ivy?

Still not sure? Consult Ivy’s Gift and No Professional Courtesies Policies or contact your supervisor or Legal and Compliance for guidance.

One Ivy

The gifts and entertainment we offer or accept reflect on Ivy and our reputation for acting with **honesty** and integrity. We’re all responsible for thinking about how our actions could impact Ivy, because our patients and partners are counting on us to do the right thing.

Conflicts of Interest

A conflict of interest can occur when our own personal interests influence or appear to influence our ability to make decisions in the best interest of Ivy. Conflicts of interest can prevent us from doing our jobs objectively and fairly. At Ivy, we value our reputation as a trustworthy organization that’s committed to clinical excellence in all that we do. To maintain this, we’re all responsible for recognizing and disclosing conflicts and potential conflicts of interest if they arise.

How we do the right thing:



Know how to recognize a potential conflict of interest and avoid potential conflicts that could affect our ability to do our work objectively.



Recognize that decisions, activities, or interests by someone in our immediate family might also be considered a conflict of interest.



Seek guidance from Legal and Compliance and disclose conflicts and potential conflicts of interest as soon as we become aware of them.

It’s All Connected: Conflicts and Patient Trust

Conflicts of interest have the potential to create the appearance of favoritism or conflicting loyalty, which can damage our credibility and **trust** that our patients place in us. You should make reasonable efforts to avoid conflicts of interest.

Here are some common situations where conflicts of interest can arise for you or your immediate family members:

- Outside business activities (including working with a competitor at the same time as working for Ivy or running your own business that provides services similar to Ivy)
- Personal relationships that may compromise your ability to be fair and objective in the course of your work
- Significant financial interests or ownership interests in a company with which Ivy does business
- Board service for a commercial or nonprofit organization

Conflicts of interest can be difficult to identify, so if you’re ever unsure, you should disclose the situation and reach out to Legal and Compliance for guidance right away. Usually, we can work together to evaluate and resolve potential conflicts together. Be sure to review our Conflicts of Interest Policy for additional information.

One Ivy

Our interests outside of work make Ivy stronger — in fact, Ivy encourages teammates to participate in activities outside of work, get involved in the community, serve others, and develop your professional skills. But, we must disclose any interests that could create a conflict or the appearance of a conflict, so that we can remain transparent and objective when working on Ivy’s behalf.

Our Work with Third Parties

Our partners reflect on Ivy and the work that we do, so it’s important that we choose our partners wisely. We work with companies that share our commitment to clinical excellence, data privacy and security, and our mission and values. We stay aware of the actions of these third parties, since we recognize we can be held responsible for the work they do on our behalf.

How we do the right thing:



Carefully select business partners who are aligned with our commitment to delivering high-quality patient care.



Thoroughly vet third parties through Ivy’s governance process and collect information for internal reviews before engaging a third party.



Speak up if we suspect that a business partner is not meeting Ivy’s standards of integrity.

It’s All Connected: Third Parties and Patient Care

The third parties we work with are a reflection of Ivy and play a key role in delivering high-quality care to our patients. Ivy participates in federally funded programs, so we must be especially careful when selecting third parties. Ivy may not employ or enter into contracts with individuals or companies who are barred or otherwise ineligible from participating in federal and state healthcare programs. This keeps our patients safe.



Know that we may be held responsible for the actions of third parties who represent Ivy.



Never enter into any arrangements with third parties without consulting your leadership and Ivy’s Legal Department.



All arrangements with third parties are reviewed and approved by the Ivy Legal Department, and if approved, the Ivy Legal Department will coordinate execution.

One Ivy

The third parties who work on our behalf represent Ivy and all that we stand for. And if these third parties engage in illegal or unethical behavior, it puts our teammates, patients, and business at risk. We hold third parties to the highest standards — and our patients share this expectation.



High-Five Moment:

High five if you don't settle for anything but exceptional services from our approved third-party vendors!



It’s All Connected – Conclusion

At Ivy, we’re all about the people. Powered by a relentless drive to transform lives, our mission is not just about therapy; it’s about amplifying impact and strengthening communities. We push boundaries to deliver exceptional care, improving patient outcomes, and helping people live life to the fullest while protecting patient privacy and upholding the highest standards.

Our work at Ivy is a passion fueled by intention and heart and commitment to Do the Right Thing and Serve Others.

We Do the Right Thing when we:



Live our values: Our words and actions reflect who we are and what we stand for.



Follow our Code and Ivy policies: We hold ourselves to the highest standards of conduct.



Make compliance second nature: We bring integrity into every interaction — with our teammates and with our patients and their caregivers.



Have the courage to speak up, knowing that we hear you: Everyone has a voice — we use it to speak up when we have questions or concerns.

Do the Right Thing!

Remember, you can reach out to the following resources with concerns:

- Your direct Manager, Regional Director, Human Resources Business Partner, Operational Leadership, Chief People Officer, or directly to the Compliance team.
- You can submit an incident report form to the Legal and Compliance teams.
- You can also anonymously report compliance matters through our secure and anonymous third-party reporting service, available 24/7.
- **Website:** lighthouse-services.com/ivyrehab
- **Email:** reports@lighthouse-services.com
- **Call:** English: (855) 644-1444 | Spanish: (800) 216-1288
- **App:** “Anonymous Reporting” | Keyword: ivyrehab
- **Fax:** (215) 689-3885



Protect What Matters Most: Trust

A thank you message from Dave Zabell, CCO and General Counsel



Our Code exists to protect what matters most — trust.

It sets the guardrails that help each of us uphold Ivy's reputation, stay aligned with laws and policies, and act with confidence in a complex and regulated environment.

At Ivy, our values don't just guide what we do — they define how we do it. They shape our decisions, our culture, and the example we set in every interaction, from patient care to teammate conversations and strategic partnerships.

That's why this Code of Conduct is more than a list of expectations — it's a shared commitment to lead with clarity, consistency, and integrity. Every choice we make, big and small, impacts our patients, our teammates, and the communities that we serve.

No matter your role — whether on the front lines or in a vital support function — living our standards strengthens everything we do. Thank you for owning this responsibility with pride. Together, we're building something meaningful and we're doing it the Ivy way.



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