ACADIA
HEALTHCARE



# CODE OF Ethical Conduct

REVISED 10/2026

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# A Message from Our Chief Executive Officer

At Acadia Healthcare, we have built our organization on a foundation of trust. This trust is earned from the patients and families who turn to us during some of the most difficult moments of their lives, from the communities we serve, and from the colleagues who dedicate themselves to our mission every day. That trust must be earned through consistent, ethical conduct and a genuine commitment to doing what is right, even when it is difficult.

This Code of Ethical Conduct reflects who we are and how we operate. It is not simply a set of rules to be followed. Rather, it is an expression of our values and a practical guide for navigating the ethical and legal responsibilities that come with working in behavioral healthcare. Every one of us, regardless of role or title, shares in the responsibility of upholding these standards.

We ask that you read this Code of Ethical Conduct carefully, refer to it often, and use it as a resource when you are uncertain about the right course of action. When in doubt, reach out. When you see something that seems wrong, speak up. Our compliance program only works when every member of our team is an active participant in it.

Thank you for your commitment to Acadia Healthcare's mission and to the patients who depend on us in their most vulnerable moments.



**DEBBIE OSTEEN**

# A Message from Our Chief Compliance Officer

Acadia Healthcare's Compliance Program exists to support you and to provide the tools, guidance, and resources you need to carry out your responsibilities with confidence and integrity. This Code of Ethical Conduct is the cornerstone of that program.

Compliance is not the exclusive responsibility of any one department or team. It is a shared obligation that extends to every employee, contractor, and leader across our organization. Each of us plays a role in maintaining the ethical culture that defines Acadia Healthcare and distinguishes us as a trusted provider of behavioral health services.

I encourage you to approach this Code of Ethical Conduct not as a compliance exercise, but as a reflection of the values we hold in common. If you ever have a question, encounter a situation that doesn't feel right, or want to better understand how a particular standard applies to your work, please reach out to the Compliance Department or to me directly at Compliance@acadiahealthcare.com

***We are here to help.***



**CARRIE UEBEL**

# About This Code

This Code of Ethical Conduct provides guidance to all colleagues and assists us in carrying out our daily activities in accordance with ethical and legal standards. These obligations apply to our relationships with patients, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants, and one another. This Code of Ethical Conduct is a critical component of our overall Compliance Program.

We developed this Code of Ethical Conduct to ensure that we meet our ethical standards and comply with applicable laws and regulations. It is intended to be comprehensive and easily understood. In some instances, this Code of Ethical Conduct addresses a subject fully and completely. In many cases, however, the subject requires additional guidance for those directly involved to have sufficient direction. To provide that guidance, Acadia Healthcare has developed a comprehensive set of compliance policies and procedures, which are available on the Ethics and Compliance section of our Company intranet. Those policies expand upon and supplement many of the principles articulated in this Code of Ethical Conduct.

The standards set forth in this Code of Ethical Conduct apply to all facilities, employees, and contractors across the organization. **These standards are mandatory and must be followed.** Failure to comply with this Code of Ethical Conduct may result in disciplinary action up to and including termination of employment or other relationship. Where a particular role, facility, or business unit is subject to additional or more specific requirements beyond the Code of Ethical Conduct, those requirements will be addressed in the applicable supporting policies.

This Code of Ethical Conduct does not address every situation you may encounter. It is intended to establish a clear framework of expectations and to point you toward the resources available when additional guidance is needed. When you face a situation that this Code of Ethical Conduct does not directly address, ask yourself whether the action you are considering is consistent with Acadia Healthcare's values, compliant with applicable law, and something you would be comfortable defending openly. If the answer to any of those questions is no, or if you are unsure of the answer, stop and seek guidance before proceeding.




*Park Royal Hospital • Fort Myers, FL*

# Our Purpose, Values, Mission, and Vision

At Acadia Healthcare, we believe that even in the darkest moments, something brighter is possible. We shift darkness into something brighter and promise a new day, not as a slogan, but as a commitment we renew with every patient we serve, every family we support, and every community we enter. That commitment is the foundation of everything we do, and it is captured in our purpose to **Lead Care with Light®**.

When people in need bravely ask for help carrying the weights of their personal worlds, they turn to Acadia Healthcare. Here, we illuminate paths to health with hope. We are honored to serve alongside passionate people who bring that promise to life both in the work we do and in the lives we touch.

As a connected community of specialized whole-person care, we uphold our values and dedicate ourselves to helping people not only survive but thrive. People of all ages, all cultures, and all backgrounds seeking mental and behavioral wellness can find refuge and relief at Acadia Healthcare. We collaborate across the continuum of care and move as one, guiding the progress and potential for hope. As we continue to move forward, Acadia Healthcare continues to grow: in skills, in talent, and in national facility access. Because everyone deserves the opportunity to choose hope and act on it.

These values define how we show up for our patients, for each other, and for the communities we serve:



### WE SET THE STANDARD FOR CARE.

We are leaders in behavioral health. Our commitment to quality clinical care, and the breadth and specialization of our treatment services, are not incidental to who we are — they are central to it.



### WE LIFT AND UPLIFT.

Each day, we bring both clinical expertise and passionate compassion to help those in our care fight and find themselves. We carry them when they cannot yet stand on their own, and we are there to lift them again every time they fall.



### WE INNOVATE QUICKLY TO CHANGE LIVES.

We seize opportunities to creatively problem-solve for the success of each patient — breaking new ground, discovering different pathways to progress, and refusing to accept the status quo when a better way is within reach.



### WE SUCCEED AS ONE.

No matter the distance or distinction between the communities in which we lead, we work together to deliver dynamic, complex care for all we serve. We are one Acadia Healthcare.

Our mission gives these values their direction: **Provide compassionate care that improves lives, inspires hope, and elevates communities.**

As a member of the Acadia Healthcare community, you are part of something larger than any single role, facility, or function. This Code of Ethical Conduct reflects the standards we hold ourselves to in honoring that mission and in ensuring that every person who turns to us for help finds the care, dignity, and hope they deserve.

# Workplace Expectations

Acadia Healthcare is committed to maintaining a workplace that is safe, respectful, inclusive, and free from harassment, discrimination, and intimidation. Every colleague deserves to work in an environment where they are treated with dignity and where their contributions are valued. These expectations apply equally to interactions among colleagues, interactions with patients and families, and interactions with vendors and business partners.

Harassment and discrimination of any kind — whether based on race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity, veteran status, or any other characteristic protected by law — are strictly prohibited and will not be tolerated. This prohibition extends to conduct that occurs in the workplace, at work-related events, and through electronic communications.

Leaders bear a particular responsibility in this area. Those in supervisory or management roles are expected to model the behaviors they expect of others, to address concerns promptly and appropriately when they arise, and to foster an environment in which colleagues feel safe raising questions and reporting concerns without fear of retaliation.

Ultimately, every decision made in our workplace should reflect our commitment to the patients we serve. A culture of respect and accountability within our organization directly supports the quality of care we deliver to those who depend on us.

# Acadia Healthcare's Compliance Program

Acadia Healthcare's Compliance Program is designed to prevent, detect, and respond to conduct that falls short of legal, regulatory, and ethical obligations. The program reflects our genuine commitment to operating with integrity, not simply our obligation to meet external requirements. Colleagues may refer to Acadia Healthcare's Compliance Policies for detailed information regarding the Compliance Program and specific additional policies.

The program is built around several core elements: clear standards of conduct, effective training and education, accessible reporting mechanisms, regular risk assessment, consistent monitoring and auditing, and a demonstrated commitment to accountability at every level of the organization. Each of these elements depends on the active participation of colleagues, operational leaders, the Compliance Department, compliance committees, and the Board of Directors.

All employees and Board members must complete general compliance training upon hire/engagement and at least annually thereafter. Additional role-specific training (for example, billing, clinical documentation, HIPAA) may be required for colleagues depending on their job function. Failure to complete required training may result in disciplinary action.

The Compliance Department is available to provide guidance, answer questions, and assist in resolving compliance concerns. Colleagues are encouraged to reach out proactively before a concern becomes a problem and to treat the Compliance Department as a resource rather than an enforcement body.

# Our Duty To Report and Our Commitment to Nonretaliation

Each of us has an obligation to promptly report known or suspected violations of law, regulation, Acadia Healthcare policy, or the standards set forth in this Code of Ethical Conduct. This obligation is not optional. Colleagues who knowingly fail to report serious compliance concerns may be subject to disciplinary action. Reporting concerns in good faith is one of the most important contributions any colleague can make to the integrity of our organization and the safety of our patients. Please refer to the *Acadia Healthcare Duty to Report Policy*.

Reportable concerns include, but are not limited to, issues related to patient safety and quality of care, billing and documentation practices, conflicts of interest, workplace conduct, privacy and data security, and any other matter that may compromise Acadia Healthcare's ethical or legal obligations. Leaders have an additional responsibility to escalate concerns brought to their attention and to ensure that those concerns are addressed through appropriate channels.

Acadia Healthcare maintains a strict zero-tolerance policy for retaliation against any individual who makes a good-faith report of a concern, participates in an investigation, or declines to engage in conduct that would violate this Code of Ethical Conduct or applicable law. A good-faith report means a report made honestly and based on a reasonable belief that misconduct may have occurred, regardless of whether the concern is ultimately substantiated. Retaliation in any form, whether overt or subtle, is itself a serious violation of this Code of Ethical Conduct and will result in disciplinary action, up to and including termination. Colleagues who believe that they have experienced retaliation should report it immediately through any of the channels described below. For more information, please refer to the *Acadia Healthcare Nonretaliation Policy*.

# How To Report a Concern

Acadia Healthcare provides multiple channels through which colleagues may report concerns. You are encouraged to use whichever channel you are most comfortable with.

- **Speak directly with your supervisor or a member of your facility's leadership team**
- **Contact the Compliance Department directly:** Compliance@acadiahealthcare.com
- **Call the Compliance Ethics Hotline:** (833) 854-7417
- **Submit a report online:**
  - File an Ethics Point Report
  - Or scan the QR code:

Reports may be made anonymously where permitted by applicable law. All reports will be taken seriously, treated with discretion, and investigated in a timely and appropriate manner. The identity of individuals who report concerns in good faith will be protected to the fullest extent possible.

# Patient Care and Safety

Our patients are the reason Acadia Healthcare exists. Every standard in this Code of Ethical Conduct, every policy we maintain, and every decision we make as an organization ultimately serves one purpose: to ensure that the individuals in our care receive safe, compassionate, quality behavioral health treatment.

Colleagues are expected to uphold patient rights at all times, to treat every patient with dignity and respect, and to deliver care that meets or exceeds applicable clinical and regulatory standards. Any concern related to patient safety, quality of care, or the rights of a patient must be reported promptly through one of the channels described above. No business consideration, financial objective, or operational constraint justifies compromising the safety, dignity, or well-being of a patient.

Acadia Healthcare strictly prohibits the use of improper incentives in connection with patient referrals or admissions decisions. Decisions about patient care must be driven by clinical need and the best interests of the patient, never by improper financial considerations or the interests of any referral source. Any arrangement that could be perceived as influencing patient care decisions for financial gain must be disclosed to and reviewed by the Compliance Department before it is entered into.



# Compliance with Laws and Regulations

Acadia Healthcare is committed to full compliance with all applicable federal and state laws and regulations. The behavioral health industry is subject to a complex and evolving regulatory environment, and each of us has a responsibility to understand the legal requirements that apply to our role and to conduct ourselves accordingly.

No colleague is expected to resolve complex legal or regulatory questions independently. When uncertainty exists, guidance should be sought from the Compliance Department, the Legal Department, Human Resources, or other appropriate subject matter experts before action is taken.

**The Federal False Claims Act** and applicable state equivalents prohibit the submission of false, fraudulent, or misleading claims for payment to government healthcare programs, including Medicare and Medicaid. Violations of these laws carry significant civil and criminal penalties, including exclusion from participation in federal healthcare programs. Colleagues who are aware of potential false claims have both a legal and ethical obligation to report them.

# Compliance with Laws and Regulations (Cont.)

**The Anti-Kickback Statute** prohibits offering, paying, soliciting, or receiving anything of value either directly or indirectly to induce or reward referrals of items or services covered by federal healthcare programs. This prohibition applies broadly and covers a wide range of financial and nonfinancial arrangements. Any arrangement involving a potential referral source must be reviewed and approved in accordance with Acadia Healthcare policy before it is implemented. Colleagues who are uncertain whether a particular arrangement is permissible should contact the Compliance Department before proceeding. For more information, please refer to the *Acadia Healthcare Anti-Kickback Statute Policy*.

**The Eliminating Kickbacks in Recovery Act (EKRA)** prohibits offering, paying, soliciting, or receiving anything of value in exchange for patient referrals to recovery homes, clinical treatment facilities, or laboratories. Colleagues must ensure that all referral, marketing, and compensation arrangements are based on legitimate business purposes and never on improper financial incentives.

**The Stark Law, also known as the Physician Self-Referral Law,** prohibits physicians from referring patients to entities with which the physician or an immediate family member has a financial relationship for the furnishing of designated health services payable by Medicare or Medicaid, unless a specific exception applies. Unlike the Anti-Kickback Statute, the Stark Law is a strict liability statute, meaning that a violation can occur regardless of intent. Compensation arrangements, ownership interests, and other financial relationships with referring physicians must be carefully structured to satisfy an applicable exception before they are implemented. Any arrangement involving a physician referral source must be reviewed and approved in accordance with Acadia Healthcare policy prior to execution. Colleagues who are uncertain whether a particular arrangement is permissible should contact the Compliance Department before proceeding. For more information, please refer to the *Acadia Healthcare Stark Law Policy*.

Acadia Healthcare's compliance program is structured in accordance with guidance issued by the Office of Inspector General of the U.S. Department of Health and Human Services and reflects the principles articulated by the U.S. Department of Justice with respect to effective compliance programs. We take these frameworks seriously and continuously evaluate our program against them.

All interactions with accrediting bodies, government agencies, and regulatory officials must be conducted honestly, professionally, and in full accordance with applicable law and Acadia Healthcare policy. Colleagues should notify the Compliance Department promptly if they are contacted directly by a government representative in connection with an audit, investigation, or inquiry, unless the matter relates to a "Protected Communication," as described further below.

All employees and contractors are responsible for maintaining any professional licenses, certifications, and credentials required for their role. Any adverse action affecting an individual's licensure status, including suspension, revocation, or voluntary surrender, must be disclosed to Human Resources and the Compliance Department immediately. Individuals may not provide services requiring a professional license, certification, registration, or credential unless such authorization is valid, active, and in good standing. Acadia screens all prospective and current employees, contractors, and vendors for eligibility, and excluded individuals may not be employed by or contracted with Acadia.

# Clinical Documentation and Billing Integrity

Accurate, complete, and truthful documentation is fundamental to patient safety, continuity of care, and the financial integrity of our organization. Every clinical and financial record must be prepared honestly, in a timely manner, and in accordance with applicable legal, regulatory, and professional standards.

Colleagues involved in clinical documentation of care rendered to our patients are responsible for ensuring that records accurately reflect the services provided, the clinical rationale for those services, and the condition of the patient at the time of treatment. Documentation must never be altered, backdated, or falsified for any reason. Records that are inaccurate or incomplete must be corrected through the appropriate process, not destroyed or concealed.

All claims submitted for reimbursement to government healthcare programs or private payers must accurately reflect services actually rendered and must be coded in accordance with applicable coding guidelines. Upcoding, unbundling, billing for services not rendered, and other forms of claims manipulation are strictly prohibited and must be reported immediately upon discovery. Colleagues who are uncertain about the proper coding or billing treatment for a particular service should seek guidance from the Compliance Department or the appropriate subject matter expert before submitting a claim. For more information, please refer to the *Acadia Healthcare Returning Overpayments and Issuing Refunds to Federal Healthcare Programs Policy*.

Acadia Healthcare maintains record retention practices in accordance with applicable law and organizational policy. Colleagues must not destroy, alter, or dispose of records outside of the established retention schedule, and must never do so in anticipation of or while subject to a preservation notice related to a legal or regulatory proceeding.

# Fraud, Waste, and Abuse

Acadia Healthcare is committed to the responsible stewardship of the resources entrusted to us, including the public funds that flow through federal and state healthcare programs. Fraud, waste, and abuse in any form undermine the integrity of those programs, harm patients, and may expose our organization and individual colleagues to serious legal and financial consequences.

Fraud involves intentional deception or misrepresentation for financial gain. Waste involves the overutilization of services or other practices that result in unnecessary costs without corresponding benefit. Abuse involves practices that are inconsistent with sound clinical, financial, or business standards, even if not intentionally deceptive. All three are prohibited and must be reported.



# Fraud, Waste, and Abuse (Cont.)

Financial and referral arrangements with physicians, clinicians, and other potential referral sources must comply with the Anti-Kickback Statute, the Eliminating Kickbacks in Recovery Act, the Stark Law, and all other applicable fraud and abuse laws. Such arrangements must be reviewed and approved in accordance with Acadia policy before they are entered into or renewed. Colleagues who are uncertain whether a particular arrangement is permissible should contact the Compliance Department before proceeding. For more information, please refer to the *Acadia Healthcare Compliance with Fraud, Waste, and Abuse Laws Policy*.

# Conflicts of Interest

Acadia Healthcare colleagues are expected to make decisions based on the best interests of our patients and our organization, and not based on personal financial interests or outside relationships. You should avoid outside financial interests that might influence your ability or motivation to fulfill your professional obligations. A conflict of interest arises when a personal interest has the potential to influence, or could reasonably appear to influence, a professional judgment or business decision. This obligation extends to "close contacts," including immediate family members and individuals with whom a colleague has a close personal or financial relationship.

All actual or potential conflicts of interest must be disclosed promptly through Acadia Healthcare's established disclosure process by reporting them immediately to your supervisor, Facility Compliance Leader, or the Compliance Department. Common examples include outside employment or business activities that compete with or relate to Acadia Healthcare's operations; financial interests in vendors, suppliers, or competitors; and personal relationships with patients, individuals in a supervisory role, or individuals with a contractual relationship with Acadia Healthcare. Disclosure does not automatically constitute a violation; however, the failure to disclose an actual, potential, or perceived conflict may constitute a violation of this Code of Ethical Conduct. Colleagues who are uncertain whether a particular situation requires disclosure should err on the side of transparency and consult the Compliance Department. For more information, please refer to the *Acadia Healthcare Conflicts of Interest Policy*.



**TESTIMONIAL**

*The comprehensive treatment programs at Starlite were able to help my husband find true sobriety and peace with his inner self. I can't recommend the treatment programs enough!*

**— Mary E.**

*Starlite Recovery Center • Center Point, TX*

# Business Courtesies, Gifts, and Third-Party Relationships

Acadia Healthcare colleagues must ensure that interactions with vendors, suppliers, referral sources, and other business partners are conducted with integrity and at arm's length. The exchange of gifts, meals, entertainment, or other business courtesies can create the appearance of improper influence, even when no improper intent exists. For this reason, all such exchanges are subject to clear limits and must comply with *Acadia Healthcare Business Courtesies to Referral Sources Policy* and applicable law.

Colleagues may neither offer nor accept gifts, meals, entertainment, or other items of value that could improperly influence (or reasonably appear to influence) a business decision, referral relationship, or purchasing decision. Nominal courtesies that are infrequent, transparent, and consistent with normal business practice may be permissible under Acadia Healthcare policy, but colleagues should seek guidance when in doubt.

No improper inducements may be offered or accepted in connection with any third-party relationship. All arrangements with vendors, consultants, and other business partners must be documented in writing, serve a legitimate business purpose, reflect fair market value, and comply with Acadia policy.

# Financial Reporting and Disclosure Integrity

Acadia Healthcare is committed to maintaining accurate, complete, and transparent financial records and disclosures. All financial statements, reports, and regulatory filings must reflect the true financial condition of the organization and must be prepared in accordance with applicable laws, accounting standards, and regulatory requirements.

No colleague may cause, assist in, or condone the preparation of misleading financial statements, the concealment of liabilities, or the misrepresentation of revenues or expenses. Colleagues involved in financial reporting are expected to raise concerns about the accuracy or integrity of financial information promptly and through appropriate channels.




*San Jose Behavioral Health Hospital • San Jose, CA*

## Insider Trading and Confidential Information

Colleagues who have access to material, nonpublic information about Acadia Healthcare or any other company, whether obtained through their role or through other means, must not trade in securities on the basis of that information or share it with others who might do so. Trading on inside information is a federal crime and a serious violation of this Code of Ethical Conduct.

Confidential business information, including, without limitation, strategic plans, financial projections or results, acquisition activity, personnel matters, trade secrets, and proprietary information, must be protected and may not be disclosed to unauthorized parties inside or outside the organization, with the exception of any "Protected Communications," as described further below. These obligations continue even after a colleague's employment or engagement with Acadia Healthcare ends.

## Anti-Bribery and Corruption

Acadia Healthcare prohibits bribery and corruption in all forms and in all jurisdictions in which we operate. No colleague or contractor may offer, provide, solicit, or accept anything of value either directly or indirectly, and regardless of local custom or practice, for the purpose of improperly influencing any business, governmental, or regulatory decision. This prohibition applies to interactions with private parties and government officials alike and extends to payments made through third parties or intermediaries. Further, this prohibition applies regardless of the amount involved and extends to gifts, meals, entertainment, travel, charitable donations, consulting arrangements, and any other thing of value intended to obtain an improper advantage. For more information, please refer to the *Acadia Healthcare Anti-Bribery and Anti-Corruption Policy*.

## Political Activities and Contributions

Acadia Healthcare respects the right of colleagues to participate in the political process as private citizens. However, colleagues may not make political contributions or engage in political activities on behalf of Acadia Healthcare without prior written authorization, and no company funds, assets, or resources may be used for political purposes except as expressly permitted by applicable law and Acadia Healthcare policy and approved through the appropriate internal process. Further, employees, officers, and directors are prohibited from soliciting contributions from coworkers during business hours and may not use company assets or resources in connection with personal political activities. Colleagues must ensure that any personal political activity is conducted on their own time and does not create the impression that they are acting on behalf of Acadia Healthcare.



# Privacy and Protection of Information

Acadia Healthcare is committed to protecting the privacy and security of patient information in full compliance with the Health Insurance Portability and Accountability Act, applicable state privacy laws, and all other relevant legal and regulatory requirements. Colleagues working for facilities offering substance use disorder treatment and/or dual treatment services including substance use disorder treatment also must comply with Part 2 (Confidentiality of Substance Use Disorder Patient Records) confidentiality and consent requirements.

Colleagues must access, use, and disclose protected health information only as necessary to perform their job responsibilities and only in accordance with Acadia Healthcare's privacy policies and applicable law. Unauthorized access to or disclosure of patient information is a serious violation and must be reported immediately.

Confidential business information, including, without limitation, strategic plans, financial data, personnel records, trade secrets, and proprietary processes, must be safeguarded with the same care. Colleagues are expected to follow Acadia Healthcare's data security requirements at all times, to use company systems responsibly, and to report any suspected breach, unauthorized access, or security incident promptly to the appropriate team.

Cybersecurity is a shared responsibility. Colleagues must safeguard passwords and credentials, use approved technologies and communication channels, remain alert to phishing attempts and social engineering tactics, and promptly report any suspected security incident.

Additional details on privacy and information security obligations are available in Acadia Healthcare's Privacy and Information Security policies on the Company intranet.

# Use of Company Assets

Acadia Healthcare's assets, including technology systems, financial resources, facilities, equipment, intellectual property, confidential information, and data, are to be used for legitimate business purposes. Colleagues are responsible for using organizational resources appropriately; protecting company property from loss, theft, or misuse; and avoiding waste. Incidental personal use of company systems may be permitted in limited circumstances in accordance with applicable policy but must never interfere with job responsibilities, compromise the security of company information, or create a conflict of interest.



# Responding to Legal and Regulatory Inquiries

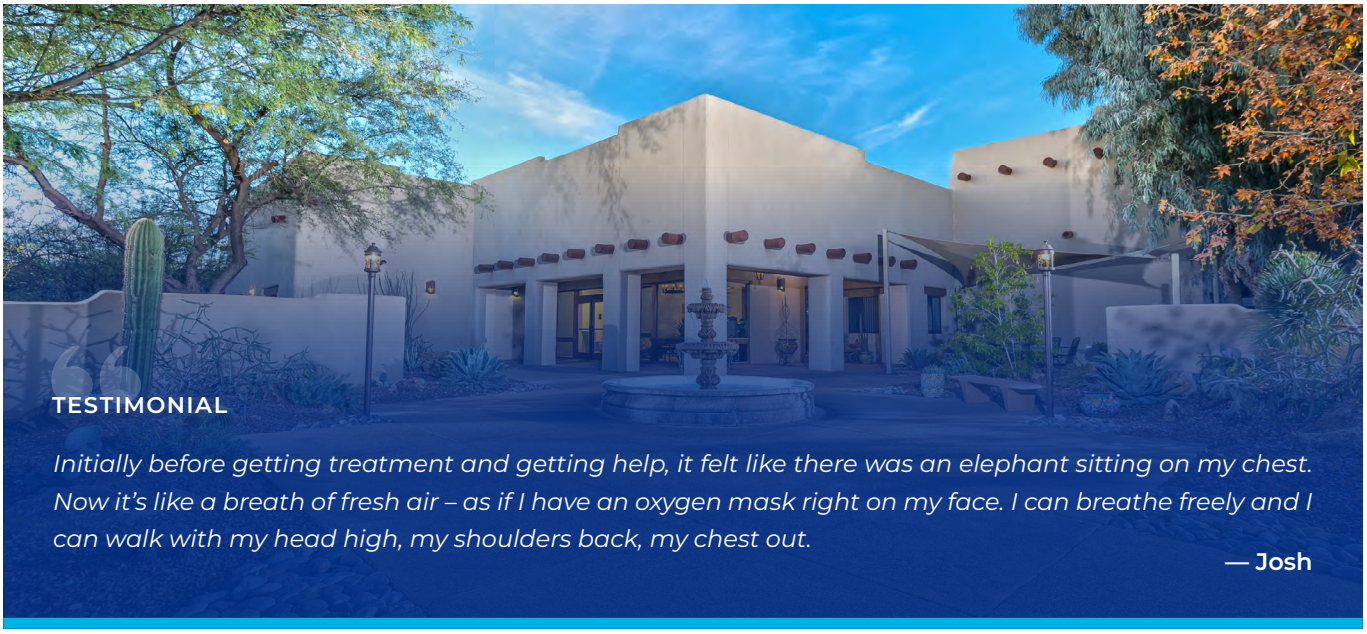
Acadia Healthcare cooperates fully with all lawful audits, investigations, and regulatory inquiries. Colleagues must respond to such inquiries honestly, accurately, and in a timely manner. No colleague may obstruct, impede, or interfere with any investigation — whether conducted internally or by an external authority. The destruction, alteration, or concealment of documents in anticipation of or during a legal or regulatory proceeding is strictly prohibited and may constitute a criminal offense.

Colleagues who receive a subpoena, civil investigative demand, or any other formal legal request, or who are contacted directly by a government representative in connection with an investigation, must notify the Legal Department and the Compliance Department immediately, unless the matter relates to a "Protected Communication," as described further below.

# Accountability and Consequences

Acadia Healthcare takes violations of this Code of Ethical Conduct seriously. Conduct that falls short of the standards set forth here or that violates applicable law or Acadia Healthcare policy will result in disciplinary action, up to and including termination of employment or contract. Enforcement will be consistent, fair, and applied without regard to an individual's title, tenure, seniority, or organizational affiliation. For more information, please refer to the *Acadia Healthcare Compliance Remedial Action Policy*.

In appropriate circumstances, violations may also be referred to law enforcement, regulatory authorities, or other external bodies. Colleagues should understand that certain violations of law carry individual criminal liability, and that Acadia Healthcare's cooperation with government investigations may include the disclosure of information about individual conduct.



**TESTIMONIAL**

*Initially before getting treatment and getting help, it felt like there was an elephant sitting on my chest. Now it's like a breath of fresh air – as if I have an oxygen mask right on my face. I can breathe freely and I can walk with my head high, my shoulders back, my chest out.*

**— Josh**

*Sierra Tucson • Tucson, AZ*

# Protected Communications

Nothing in this Code of Ethical Conduct prohibits or restricts any individual, without notice to or permission from Acadia Healthcare, from reporting possible violations of law to a governmental agency or regulatory authority, participating in a governmental investigation regarding concerns of possible violations of law, or making disclosures protected by applicable whistleblower laws.

# Resources and Where To Go for Help

Acadia Healthcare provides a range of resources to help colleagues understand and fulfill their compliance obligations. You are encouraged to use these resources proactively before a concern becomes a problem.

- **Ethics and Compliance Policies:** Available on PolicyStat
- **Call the Compliance Ethics Hotline:** (833) 854-7417
- **Submit a report online:**
  - File an Ethics Point Report
  - Or scan the QR code:

No colleague should ever feel that they have nowhere to turn. If you are uncertain about the right course of action, ask. If you see something that doesn't seem right, report it. Acadia Healthcare's Compliance Program depends on each of us doing our part and on our shared commitment to act with integrity, accountability, and respect for those we serve.

For compliance with California AOD Certification Standards, see Employee Handbook.

Acadia Healthcare Company, Inc. ("Acadia") is a holding company whose direct and indirect subsidiaries conduct healthcare and management operations. Unless the context otherwise requires, all references in this policy to "Acadia," "Acadia Healthcare," "the company," "we," "us," or "our" mean Acadia Healthcare Company, Inc. and its consolidated subsidiaries. The terms "facilities," "centers," "clinics," and "hospitals" refer to entities owned, operated, or managed by subsidiaries of Acadia Healthcare Company, Inc. References herein to "employees," "colleagues," or "personnel" refer to employees of subsidiaries of Acadia Healthcare Company, Inc. References herein to "corporate" refer to Acadia Management Company, LLC.



*Cadillac Mountain • Acadia National Park*