

Organizational Code of Ethics & Professional Conduct

1. Purpose and Applicability

Brandis Center Inc. is committed to compassionate, ethical, individualized applied behavior analysis (ABA) services. This Code consolidates the ethical expectations reflected in the Employee Handbook, Patient Handbook, and Consent & Policy Packet. It applies to organizational leadership, clinical and administrative employees, and others acting on the organization's behalf, as appropriate to their roles. This Code supplements, rather than replaces, those documents, applicable laws, payer requirements, and relevant professional standards.

2. Our Core Ethical Commitments

We conduct ourselves with honesty, integrity, accountability, professionalism, and respect. Patient safety, dignity, rights, clinical needs, and informed participation guide our decisions. Employees must act within their training, assigned responsibilities, and professional scope; seek supervision when uncertain; and avoid allowing personal, financial, or organizational interests to compromise care.

3. Patient Rights, Dignity, and Individualized Care

Patients and families must be treated with courtesy, compassion, and respect in a safe, supportive, inclusive environment. Services and clinical recommendations must be individualized, based on assessed needs and medical necessity, and delivered according to approved treatment plans and clinical direction. Parents and legal guardians are encouraged to participate in treatment planning, ask questions, and receive understandable information about treatment recommendations and changes. Staff must protect dignity during all services, including personal care and behavioral intervention.

4. Informed Consent, Privacy, and Confidentiality

Staff must respect informed consent and the rights described in the Patient Handbook and Consent & Policy Packet. Patient, family, employee, and organizational information must be accessed, used, stored, and disclosed only for authorized purposes and in accordance with applicable privacy requirements, including HIPAA. Employees must use approved systems, protect credentials and records, and promptly report suspected confidentiality breaches or unauthorized access to a supervisor or Company owner. Photographs, recordings, and disclosures for non-treatment purposes must follow the applicable authorization requirements.

5. Professional Boundaries and Conflicts of Interest

Employees must avoid actual or perceived conflicts of interest and dual or multiple relationships that could impair judgment, exploit or harm others, or interfere with professional responsibilities. Potential conflicts or dual relationships must be promptly disclosed to a supervisor or Company owner. Outside employment is permitted subject to existing handbook restrictions on interference with duties, use of Company resources, confidentiality, and solicitation. Employees must not accept gifts, payments, or favors that could improperly influence professional judgment or violate applicable professional standards.

6. Honest Clinical Records, Billing, and Business Practices

Clinical data, session notes, service times, and billing-related records must accurately reflect services actually provided. Billing for services not rendered, changing records to match billing, documenting sessions before they occur, falsifying data, or using another person's credentials is prohibited. Staff must follow applicable payer authorization, documentation, and fraud, waste, and abuse requirements. Questions or suspected irregularities must be brought to appropriate leadership promptly.

7. Respectful Employment Practices and Nondiscrimination

Brandis Center prohibits unlawful discrimination, harassment, retaliation, and disrespectful treatment. Employees must treat coworkers, patients, families, vendors, and visitors professionally. Clinical decisions must be based on medical necessity, clinical appropriateness, patient safety, and applicable professional standards—not improper bias. Reasonable accessibility and language-assistance needs should be brought to the organization so appropriate arrangements can be considered.

8. Safe Care and Legal Reporting Responsibilities

Employees must follow safety procedures, clinical direction, and applicable reporting laws. Suspected child abuse or neglect must be handled under the Employee Handbook's mandated-reporting policy; internal notification does not replace an employee's independent legal reporting responsibilities. In an immediate emergency, call 911. Employees must promptly communicate concerns affecting patient safety to the supervising BCBA or organizational leadership.

9. Technology, Social Media, and Public Communications

Company systems must be used responsibly and securely. Employees may not disclose identifiable patient information through personal social media, use unauthorized systems to transmit confidential information, or represent themselves as speaking for Brandis Center without authorization. Personal social media connections with current patients or their families are restricted as described in the Employee Handbook.

Technology-assisted documentation must protect confidentiality and must not replace qualified clinical judgment.

10. Relationships with Families, Vendors, and Other Parties

Interactions with families, referral sources, payers, vendors, and community partners must be honest, respectful, and professional. Staff must not misuse confidential information, Company resources, or professional relationships for personal advantage. Family concerns and grievances must be received respectfully and addressed through the processes described in the Consent & Policy Packet, without retaliation for good-faith complaints.

11. Recognizing and Reporting Ethical Concerns

An ethical concern may involve conduct inconsistent with this Code, an existing Brandis Center policy, applicable law, payer rules, or relevant professional obligations. Employees should consider whether an action protects patient rights, accurately represents services, maintains confidentiality, avoids conflicts, and can be explained openly to appropriate leadership. Suspected concerns should be promptly reported to a clinical supervisor/BCBA or Company owner. If the concern involves a direct supervisor, employees may contact a

Company owner. Reports made in good faith must be treated as confidentially as practicable, and retaliation for reporting or participating in a review is prohibited. External reporting obligations remain applicable where required by law or professional rules.

12. Review, Accountability, and Corrective Action

Leadership will evaluate reported concerns based on the available facts, relevant records, applicable policies, and professional or legal requirements. Where appropriate, the organization may seek clinical consultation, take corrective action, provide additional guidance or training, or refer matters to outside authorities when required. Violations may result in disciplinary action, up to and including termination, consistent with existing policies and applicable law. Employees should seek guidance before acting when ethical obligations are unclear.

13. Access, Orientation, and Continuing Awareness

Following approval, this Code is intended to be made available to employees and other relevant parties, including through the organization's website resources and employee-accessible materials. Leadership will establish and document how the approved Code is introduced to employees, how questions are addressed, and how subsequent revisions are communicated. Publication alone does not establish completion of employee training; training and acknowledgments must be documented separately when implemented.

14. Relationship to Existing Policies

This Code is a consolidated summary of expectations set forth in the 2026 Employee Handbook, 2026–2027 Patient Handbook, and 2026–2027 Consent & Policy Packet. More detailed requirements—including employee reporting procedures, mandated reporting, confidentiality, social media, patient rights, grievances, and consent—remain governed by those documents and applicable law. If an apparent inconsistency is identified, employees should seek clarification from organizational leadership rather than independently disregard a policy.

Examples of Ethical Decision-Making

- **A family offers an expensive gift:** Politely pause acceptance and ask a supervisor whether it creates a conflict or violates the gift policy.
- **A coworker asks you to record time for a missed session:** Do not enter inaccurate time; report the request to appropriate leadership.
- **A parent sends a personal social media request:** Do not establish a personal social media connection; redirect communication through appropriate channels.
- **You suspect patient information was sent to the wrong person:** Promptly report the possible breach and follow organizational privacy procedures.
- **A caregiver disagrees with a treatment recommendation:** Listen respectfully, involve the supervising BCBA, and support the caregiver's participation and consent rights.