

# Sobel & Raciti Associates, Inc. (S&R)

## Code of Conduct

S&R is dedicated to conducting our business with a high regard for professional ethics, business ethics, and respect for human rights, human dignity and the environment. It is of utmost importance to our company to foster an organization that allows employees to reach their highest potential, enjoy their work and provide excellent service to our client companies and community. We recognize the importance of helping our employees, suppliers, and client companies to balance work and life responsibilities.

To these ends, we are committed to the following guiding principles:

1. **Equal Opportunity and non-discrimination:** S&R is committed to equal opportunity and nondiscrimination in all recruiting, hiring, promotion of personnel, operations and contracted services, and does not discriminate on the basis of race/ethnicity, color, religion, sex, age, marital status, national origin, sexual orientation, ancestry, disability, or veteran status. S&R has zero tolerance for discrimination in hiring practices. S&R follows all applicable state and federal guidelines.
2. **Zero tolerance:** S&R is committed to zero tolerance for any form of harassment, including sexual harassment, bullying, discrimination and disrespectful behavior and words that could contribute to the perception of a hostile work environment. To the extent appropriate and proper, every reported complaint of harassment or discrimination will be thoroughly investigated. S&R will not tolerate retaliation against anyone who has made a complaint or who cooperated in the investigation of a complaint.
3. **Safety:** S&R is committed to the physical and emotional health and safety of our workforce. This includes maintaining a drug-free workplace. Good work-life balance, high morale and a healthy workforce all contribute to providing world-class service to the employees and family members of our client companies.
4. **Confidentiality:** All information about client companies, potential client companies, EAP and work-life clients, and affiliates is protected. All staff understands and agrees that this information is proprietary, confidential and classified information. There shall be no disclosure of any confidential information to anyone outside S&R, without proper authorization. All employees of S&R have the responsibility to safeguard all 'confidential' information. Within S&R, 'confidential' information shall be disclosed and/or discussed with individuals only on a 'need to know' basis. S&R and its' vendors follow strict HIPAA guidelines and has a privacy officer.

5. **Discipline:** S&R will address all disciplinary concerns in a timely, consistent and fair manner, and will include people on a 'need-to-know' basis.
6. **Commitments to others:** Honoring commitments to client companies, company employees and family members, vendors, affiliates, to the community, and to each other is integral for S&R.
7. **Conflict of interest:** The interests of our clients, our client companies, our vendors, our affiliate providers and the stability of our company are paramount. There can be no competing personal interests which interfere with the provision of excellent services of S&R products, including, but not limited to: EAP, Work-Life, HPL Coaching, Pre-employment testing.
8. **Environment:** Strong environmental awareness and protection is a key value supported by S&R. Employees are encouraged to practice the 3 Rs – reduce, reuse, recycle. To this end, we have established a recycling program in the Providence office that complies with the requirements of RI state law.