

## Atria Senior Living, Inc.

### Ethics Reporting Services

As part of its Guidelines for Business Ethics, the Company has established a toll-free telephone number maintained by a third-party vendor which you can use to anonymously report any concern about legal or ethical issues in your workplace without fear of retaliation. The toll-free number is 1.800.313.9557 and you may call anytime, 24 hours a day, seven days a week.

The third-party vendor also provides for reports to be made through an anonymous web reporting service or by mail. To utilize the web reporting service, you can submit a report by accessing the vendor's website at [www.lighthouse-services.com/atria](http://www.lighthouse-services.com/atria).

If you prefer to contact the third-party vendor via regular mail, you can send your report to the following address:

Lighthouse Services, Inc.  
Re: Atria 1710 Walton Road, Suite 204  
Blue Bell, PA 19422

### When Should I Use the Ethics Reporting Services?

If you think that something is wrong, are unsure what is proper conduct in a particular situation, are aware of a situation that you believe to be illegal, irresponsible, ethically questionable, or a violation of Company policies, including the policies set forth in these Guidelines, you have a duty to raise questions and report concerns immediately. Doing so will give the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to the health and safety of our residents or the Company's reputation. We encourage you to first report the matter to your immediate supervisor, Human Resources, or the Company's General Counsel. If doing so is impractical, you should utilize one of the ethics reporting services noted above. Atria has a strict policy against retaliation for good faith reports. No one may threaten you or take any action against you for raising questions or reporting concerns.

If you contact one of our ethics reporting services to report a concern or suspected violation, an operator employed by the third-party vendor, not Atria, will ask a series of questions designed to clearly define the situation being reported. You may voluntarily report your name and contact information, but this information is not required. If you choose not to provide this information, your initial communication to our third-party vendor will be treated confidentially and your identity will remain anonymous to the fullest extent possible. In some instances, however, it may be impossible to keep your identity confidential because of the demands of conducting a thorough investigation of your report or because of certain legal requirements.



The Company takes all reports of possible misconduct seriously. We will investigate the matter confidentially, make a determination whether Atria policy, these Guidelines, or the law have been violated, and take appropriate corrective action. If you become involved in an investigation of possible misconduct, cooperate fully and answer all questions completely and honestly.

## **Employees Responsibilities**

These Guidelines for Business Ethics apply to all employees of Atria and all employees managed by Atria. These Guidelines for Business Ethics are a statement of basic principles, policies, and procedures that apply to all Atria employees as they conduct the Company's business. It is important that you understand how these standards apply to you. They are intended to help you conform to high ethical standards and to protect Atria's and your reputations.

Other policies and procedures not listed in these Guidelines also apply to employees. You are expected to ask about, be familiar with and comply with all policies and procedures that apply to your positions and responsibilities. All employees should respect and comply with all applicable laws, rules, and regulations of the U.S. and the states, counties, cities, and other jurisdictions in which Atria conducts its business.

If you are a manager, you are expected also to ensure that all individuals you supervise are aware of these policies and procedures and to promote compliance with them.

**Failure to adhere to these Guidelines or any applicable laws, rules, or regulations may subject you to corrective action, up to and including termination of employment. Violations of the law may also result in severe fines and penalties against Atria, and fines and even imprisonment for individuals.**

Nothing contained in these Guidelines creates any rights to continued employment. Either Atria or you may terminate your employment at any time for any reason.

