



CRISTA Ministries

Employee Code of Ethics & Conduct

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**“He has shown you, O mortal, what is good. And what does the Lord require of you?
To act justly and to love mercy and to walk humbly with your God.” -- Micah 6:8 (NIV)**

**ACT
JUSTLY**

We diligently seek to understand and comply with the laws, regulations and policies that govern our operations and ministry.

**LOVE
MERCY**

We train and hold each other accountable with grace and kindness, speaking the truth in love.

**WALK
HUMBLY**

We are aware of God’s presence in all we do; therefore, we are ethical and diligent in our work and respectful in our relationships with others.

EMPLOYEE CODE OF ETHICS & CONDUCT

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An interactive on-line version of the Code is available on the M68 Stewardship Page on CRISTAweb.

A Message from our President



This *Code of Ethics & Conduct* is designed to help guide and align our behaviors as we make decisions that impact our daily operations. Along with other employee resources such as the *Employee Handbook* and specific ministry and department guidelines, this Code provides the framework for employee behavior that is consistent with our organization's values. We want to behave in a manner that is pleasing to God. Consequently, we follow the requirements set forth in **Micah 6:8** and together agree to act justly, love mercy and walk humbly with God.

As an organization on **One Mission**, we commit to honest and ethical conduct as well as compliance with the letter and the spirit of the laws, regulations and policies that govern our work. This Code represents our culture, which embraces our values and leadership traits and ultimately drives our daily conduct. Please familiarize yourself with this Code and revisit it for guidance for the right thing to do in any given situation.

Thank you for your ongoing commitment to loving God by serving people and doing so while remaining Christ-centered, highly professional and service-driven.

A handwritten signature in black ink that reads "Bob".

Bob Lonac
President & Chief Executive Officer
CRISTA Ministries

“He has shown you, O mortal, what is good. And what does the Lord require of you?
To act justly and to love mercy and to walk humbly with your God.” - Micah 6:8 (NIV)



CRISTA CULTURE STATEMENT

We are a family of ministries that serve people worldwide through education, camps, international relief and development, senior care and media. We are working together as one body under the Lordship of Jesus Christ to serve others. Our identity in Christ is the foundation from which we live out our faith in vocation. We have an abiding commitment to accountability and righteousness. We believe people of God are to be an example to others, known by their love, grace, truth, service and good citizenship. Therefore, all employees are expected to exhibit ethical behavior and follow standards established by biblical, moral and legal principles both inside and outside of the workplace.

Unity

As a family of ministries, we are diverse in our service methods, yet unified in our Mission to love God by serving people. We understand that God's plans involve working as a unified body without regard to personal agendas or preferences, with oneness of heart and mind. As we work to realize the individual goals of each ministry, we make every effort to keep God's will for the entire organization at the forefront of our decision-making and our internal collaborations. Moreover, we continually strive to edify one another by building close, trusting and productive relationships as we work to achieve our one Mission.

Humility

We believe that we are on a mission from God and that He leads us in all that we do. We proclaim that all of our power, talent and gifting comes from God, not from ourselves. We regularly engage in self-examination of our actions and words, try to see ourselves as God sees us and confess and seek forgiveness from God and one another when appropriate.

Leadership

Servant leadership defines how we engage our constituents and conduct business. In this regard, every person working on behalf of the organization assumes a service-driven leadership role and exhibits the Traits of a Leader. We require that all employees do their best to set aside their desire for personal gain, put the good of the organization above their personal needs and lead according to our Vision, Mission and Guiding Principles. Furthermore, as servant leaders, we make it a priority to build internal and external trust and to take ethical action to realize our collective ministry goals.

Integrity

We believe Christ-centered integrity is vital to how we conduct business and serve others. To us, that means a consistent demonstration of honesty, truthfulness and accuracy in our interactions with our employees, constituents, business partners and stakeholders. Moreover, our commitment to integrity includes; complying with all applicable rules and laws that govern our organization and requiring those who report to us to do the same on behalf of the organization.

Excellence

We believe that modeling Christ includes being highly professional while striving to achieve excellence in our relationships, our problem solving and our quality of work. This means always performing at the highest possible standard and giving our best without regard to reward or recognition. There is an understanding that even if no one else knows, we will know and God will know. God's approval is much more valuable to us than the praise of others.

Development

We believe that every employee has been called by God to join in the organization's Mission and is a vital part of the ministry. We value change and innovation. We are committed to the professional experience and growth of our employees by helping them develop their individual gifts, talents and specialized skills.

Diversity

We are devoted to creating and maintaining an environment that welcomes diversity. To us, that means respecting and valuing our individual differences and creating workplace practices that encourage collaboration and capture the benefits of many diverse perspectives.

Stewardship

We understand that we are stewards over the resources that God and our donors have entrusted to us. Therefore, we are driven to use those resources for the sole purpose of advancing God's kingdom. In light of that, we seek to maintain an environment of openness and accountability. Our commitment to complete transparency extends to responsibly managing our resources and expecting that anyone working on behalf of our organization will do the same. Lastly, all of our locations are gifts from God, and therefore, Holy Ground that we care for and treat with respect.

As we endeavor to engage in conduct that is in-line with our love for Christ and the principles that guide our family of ministries, we will forever be mindful to **act justly, love mercy and walk humbly with God. Micah 6:8.** We hope to continuously earn the valued trust of our employees, donors and constituents.

Introduction

It is our practice to conduct ourselves with the highest standards of ethical behavior while meeting the needs of our constituents, interacting with each other and protecting the organization's interests. Employees are expected to engage in behaviors consistent with this Code's guidelines and comply with all applicable laws, regulations and policies. This Code covers a broad range of business practices and is designed to help employees make ethical and "best practice" decisions. The Code represents core behavior expectations that are applicable organization-wide and will evolve and grow to meet the organization's needs.

Raising Concerns

In order to resolve problems, employees are encouraged to raise concerns in good faith by communicating honestly with the individual(s) causing the concern, or leaders who have authority to help reach a resolution.

Employees who encounter activities that appear out of compliance with this Code are responsible to report them to their supervisor, ministry or department leader. If there is no response, employees should go to Human Resources or Law & Corporate Affairs. Employees wishing to raise concerns anonymously may do so by using EthicsPoint, CRISTA's web-based or telephonic reporting hotline. To make an EthicsPoint report; (1) call 1-888-530-6693 (toll free in the US and Canada); (2) use the link located on the CRISTAweb home page or; (3) go to crista.ethicspoint.com. Employees outside the US and Canada who do not have internet access may contact their local operator and request a reverse charge or collect call to the US phone number above, and use "CRISTA" as the company name placing the call. Additionally, employees are encouraged to suggest improvements for our workplace by submitting a Workplace Innovation Need (WIN) on the M68 Stewardship CRISTAweb page.

Communicating Concerns

When making or receiving reports regarding potential legal or compliance issues, employees on all campuses should promptly notify the Law & Corporate Affairs department. Reports regarding other matters can be handled by the appropriate department (e.g., employee relations issue - Human Resources department, safety issue - Facilities department, payroll issue – Accounting department, etc.).

Addressing Concerns

Reports of Code noncompliance and other ethics reports will be investigated by appropriate personnel. Employees are expected to participate in investigations when they have factual knowledge of the subject matter at issue. The organization takes employee reports and concerns seriously and reports substantial violations, investigations and outcomes to the CRISTA Board of Trustees Audit Committee.

No Retaliation

The organization has a firm policy prohibiting retaliation against employees who make good faith reports of potential Code noncompliance and other ethics concerns or participate in investigations regarding the same. Forms of retaliation include, but are not limited to, termination, demotion, or other adverse employment actions that occur as a direct result of an employee's good faith report or participation in an investigation. Any supervisor that retaliates against another employee in this way will be subject to disciplinary action, up to and including termination of employment. Employees who believe that they have been subject to retaliation while complying with this Code should contact Human Resources or the Corporate Compliance Officer. **More information about retaliation can be found in the organization's Whistleblower Policy and in the Retaliation Section of the Employee Handbook.**

Being Fit for Duty

WALK
HUMBLY

Employees are expected to be mentally and physically fit for work, to report to work fit for duty, and to remain fit while on duty. While on duty, employees may not be under the influence of alcohol or any drugs that impair their ability to perform work safely and efficiently. Employees should never sell, offer to sell, transfer, provide, share or purchase drugs (prescription or otherwise) while on duty or on the organization's property, nor possess or be under the influence of medication prescribed for someone else.

Employees must tell their supervisor if they are taking prescription drugs or over-the-counter medications that they reasonably believe could affect their ability to work safely or efficiently. Employees do not need to disclose the reason for taking the medication.

Q

I'm taking prescription medication that could inhibit my ability to work, but I don't want to tell my supervisor because I don't want to reveal my medical condition. Do I have to tell my supervisor what kind of medication I'm taking and why I'm taking it?

A

No, you are not required to tell your supervisor the type of medication you are taking or why you are taking it. However, you must inform your supervisor about the effects of a medication that you and your treating physician (who understands your work activities) believe could affect your work performance. You and your supervisor can then determine whether you can perform your work safely and efficiently. Depending on the nature of your position, this may require a doctor's written opinion concerning your ability to safely perform your job duties.

Abstaining from Substance Use

WALK
HUMBLY

Employees must report to work free from the influence of alcohol, medication that can impair judgment, marijuana, or any illegal substance. Employees must not consume alcohol, marijuana, or any illegal substance while on duty, including during lunches and rest periods, and must not operate CRISTA-owned, leased or rented vehicles or equipment after consuming alcohol, medication that can impair judgment, marijuana, or any illegal substance.

Q

When I attend work-related conferences, there are times when I have dinner with other conference attendees after the conference has ended for the day. May I consume alcohol at dinner?

A

You should not consume alcohol to the extent that you would negatively affect the organization's reputation or image. Also, if you are operating a personal vehicle after consuming alcohol, it is your responsibility to make sure that you are fit to drive in compliance with the law.

Additional Resources

- **Employee Handbook, Alcohol and Drug Section**
- **Transportation, Drug and Alcohol Abuse Policy**

Avoiding Conflicts of Interest

WALK
HUMBLY

Employees must disclose all relationships that compromise, or may reasonably appear to compromise, their ability to make impartial business decisions on behalf of the organization or quality of work performance.

Influencing Business Decisions for Personal Gain

Potential conflicts of interest arise when employees influence or participate in a work decision that could be personally beneficial to them, their family members or persons with whom they have close relationships.

If you have a potential conflict of interest relating to a business decision:

- Disclose the financial interest or potential conflict to your supervisor in writing.
- If the relationship or transaction causing the potential conflict cannot be avoided, you and your supervisor must complete a **Conflict of Interest Disclosure Form** for approval. Disclosure Forms are located on the M68 Stewardship CRISTAweb page.
- If the relationship is deemed to be a conflict of interest that cannot be mitigated, you may be excluded from participating in the decision or transaction, or the organization may adopt other effective measures to address the conflict of interest.

Q

How do I know whether an activity in which I am engaged outside of work creates an actual or potential conflict of interest?

A

A conflict situation can arise when you have a relationship with an employee or vendor that creates an interest that may make it difficult for you to perform your work objectively and effectively. Conflicts of interest also arise when you or your family member receive personal (including financial) benefits as a result of your position in the organization. If in doubt, ask your supervisor or check with the Law & Corporate Affairs department.

Avoiding Conflicts of Interest (continued)

Favored Treatment

Employees may not use their positions in the organization to obtain or provide favorable treatment for themselves, relatives or others with whom they have personal relationship. This can include preferential treatment, hiring or promoting employees or selecting contractors and vendors without a reasonable investigation of alternatives.

Q

I have a cousin that owns a structural engineering firm that wishes to provide services to CRISTA. May CRISTA still select her firm as a vendor?

A

Possibly. First, you must disclose the relationship in writing to your supervisor. Upon receiving other vendor bids for the performance of work, you and your supervisor must complete a Conflict of Interest Disclosure Form for approval by a Vice President and the Law & Corporate Affairs department. The organization may take additional remedial measures to address the potential conflict prior to hiring your family member's firm to complete the work.

Close Personal Relationships

Any close personal relationship, especially a romantic one, should not exist between a supervisor and an employee within the same hierarchy of authority. Any relationship falling within this category must be reported to the ministry or department leader.

Q

I am dating a co-worker who occasionally serves as the acting supervisor for my group. Do we have to bring this to the attention of our supervisor or Human Resources?

A

Yes. This situation creates a conflict of interest in your group. Even if you and your colleague are currently equals in the same group, you should advise your supervisor of the relationship so that your supervisor can address the potential conflict.

EMPLOYEE CONDUCT STANDARDS

Avoiding Conflicts of Interest (continued)

WALK
HUMBLY

Accepting and Giving Gifts

Employees may not accept or give personal gifts that unduly influence business decisions or cause others to perceive that there has been an undue influence. Personal gifts provided by persons outside of the organization may only be accepted with supervisor approval. Upon receipt of a personal gift, employees may either, (1) politely refuse the gift, or (2) provide the gift to their ministry or department manager for handling. All gifts must be disclosed to the ministry or department manager, even if believed to be of modest value.

Employees must check with their supervisor before accepting or giving a gift since individual ministry and department policies vary based on the nature of work. Supervisors and managers should consult with the Corporate Compliance Officer or Human Resources to ensure that their decision making concerning the gift at issue is correct.

Q

What if I receive a gift that I know is not acceptable? What should I do?

A

You should return it with a polite explanation that the organization prohibits you from keeping it, or check with your supervisor to determine whether the gift can be used to benefit the organization.

*Additional
Resources*

- **Employee Handbook, Gratuities Section**
- **Senior Living, Gift, Gratuity and Entertainment Policy**
- **World Concern, Fraud Management Policy**

Protecting Confidential Information

ACT
JUSTLY

Employees shall maintain the confidentiality of information entrusted to them, except when disclosure is properly authorized or legally mandated. Employees may not view, use or share confidential organization information for non-business reasons, or to obtain a personal gain or advantage. This obligation continues even after employment ends. Revealing non-public information obtained in the course of employment is a violation of this Code and may be illegal.

The following list contains examples of non-public information considered confidential that may not be disclosed:

- **Constituent information:** personal or identifying information about students, residents, donors, campers, radio/media users or international aid recipients.
- **Employee information:** home address, social security number, benefits, images, salary information and performance evaluations.
- **Intellectual property:** information used to achieve organization ministry goals or to evaluate the merits of our service, marketing methods, strategic plans as well as unique products and services.
- **Health information:** personal health information that identifies patients, residents and employees. Disclosure is strictly prohibited under the provisions of the Health Information Protection Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health (HITECH) Act.

Additional HIPAA Resources

- **Employee Handbook, HIPAA Section**
- **Senior Living, HIPAA Policy**

If you have questions about or need to report a disclosure of confidential information, contact your supervisor or the Corporate Compliance Officer. You may also ask a question or report a disclosure through EthicsPoint.

EMPLOYEE CONDUCT STANDARDS

Promoting Safety

ACT
JUSTLY

All employees, volunteers and contractors share the responsibility for safety in the workplace. Employees are expected to work safely and in compliance with safety and health rules and procedures. Ensure that the work environment is safe by identifying and controlling unsafe conditions and safety hazards. Help and encourage others to make safety in the workplace a priority by reporting unsafe conditions or hazards to the Facilities department and the Corporate Compliance Officer. Employees should also report unsafe conditions or hazards to a Director or Vice President.

Employees should immediately report all workplace accidents, injuries, illnesses, property damage and unsafe conditions to their supervisor and complete an **Incident & Injury Intake Record** which can be obtained from their supervisors or Human Resources.

Q

I was injured at work, but I don't want to report it because I don't want to create problems and I feel like the injury was my fault. What should I do?

A

You are responsible for reporting workplace injuries on the day that they occur, even if you are unsure of the extent of your injury. Injuries should be immediately reported to your supervisor and Human Resources without consideration to whether you believe that your actions were the cause of the injury.

*Additional
Resources*

- **Employee Handbook, Safety and Security Section**

Preventing Harassment and Discrimination

ACT
JUSTLY

Employees shall conduct themselves in a professional manner and treat others with respect, fairness and dignity. Employees may not participate in harassment or discrimination, including harassing or discriminating behavior, comments, jokes, slurs, email messages, pictures, photographs, or any other means of contributing to an intimidating or offensive environment. Such conduct can result in termination of employment.

All employees are expected to be familiar with the organization's standards on harassment and discrimination which can be found in detail in the Employee Handbook. Employees shall seek to go beyond simply meeting the letter of the law and, instead, assess behavior against CRISTA's Culture Statement. Employees who engage in, or fail to take action to stop discrimination and harassment expose the organization to liability and themselves to personal liability.

Dealing with harassment or discrimination?

If you feel that you or a colleague have been subjected to harassment or discrimination, speak up and tell the person you disagree with his or her actions or behavior, explain why, and ask the person to stop. If you are not comfortable with this approach or if it fails to resolve the issue, contact your supervisor, Human Resources, the Corporate Compliance Officer or file an EthicsPoint report.

Q

My supervisor is highly critical of my work, which makes me feel uncomfortable. Is that harassment?

A

You are entitled to work in an environment free from intimidating, hostile or offensive behavior that is based on illegal discrimination. Not every offensive or critical comment is based on illegal discrimination. To be considered illegal harassment or discrimination, the conduct must be based on an employee's race, gender, age or another status that is legally protected. Even if you are unsure if your supervisor's conduct is prohibited by law, consult CRISTA's Employee Handbook or Human Resources for assistance in addressing the issue.

Q

What if I receive an e-mail that includes offensive jokes or language?

A

Jokes that could be reasonably viewed as offensive have no place in our work environment and should not be sent through the organization's e-mail system. You should tell the coworker who sent the e-mail that you find the e-mail offensive and believe it might violate this Code or other organization policies. If you received the e-mail from a sender outside of the organization, please notify him or her that you may not receive such material on your work e-mail account.

EMPLOYEE CONDUCT STANDARDS

Protecting Organization Resources & Funds

WALK
HUMBLY

As stewards of organization resources, all employees are responsible to safeguard against unauthorized modification, disclosure, waste, loss, destruction, misuse or theft of resources under their control. Resources may include organization documents, confidential information, property, facilities, time, funds, office supplies, tools and similar construction equipment. Resources must not be used for private commercial enterprises or personal use or gain. Employees unsure about the appropriateness of a specific use of an organizational resource, should ask their supervisors or contact the Corporate Compliance Officer.

Q

What if I write a personal letter on my work computer, visit non-business related websites, or call a family member or friend from my office phone? Are these types of activities ok?

A

Generally, limited personal use of this specific nature is permitted as long as a significant cost is not assumed by the organization and your work is not disrupted. Employees who have an organization issued smart phone and personally contribute to its costs, may use the phone for personal purposes (but do not have a right to privacy of its contents). If you are using your work computer to conduct personal business during the workday, you should only do so during a break time when you would normally conduct any other personal business.

Q

How do I know if my personal use of organization resources constitutes misuse or noncompliance with this Code?

A

If you were paying out of your own pocket, would you consider the cost to be significant? Are you using this organization resource in order to avoid personal expense? If you hesitate before answering “no” to either of these questions, or if you are reluctant to ask your manager for guidance, it is likely that the use is not in compliance with this Code.

Protecting Organization Resources & Funds (continued)

WALK
HUMBLY

Employees may only use organization funds for business expenses only. Employees must use good judgment to keep business expenses reasonable and in line with ministry or department budgets. Employees must comply with the organization's requirements for incurring and reporting travel and business expenses. This includes reporting all expenses promptly and according to the Accounting department's policies. Employees must not make unauthorized or personal purchases on organization credit cards, purchase orders or by any other means.

Q

I am traveling on a business trip with my spouse. When we go out to dinner, may I charge my spouse's meal to my organization credit card?

A

Generally, no. Organization credit cards may be used for employee business expenses only. An exception exists in the rare event that your spouse's participation in the business event is necessary and appropriate to serve the business purpose, and is pre-approved by your supervisor.

*Additional
Resources*

- **CRISTA Travel and Expense Reimbursement Policy**
- **Purchasing Policy Guidelines**

Properly Retaining Records

ACT
JUSTLY

Due to operational, regulatory, and legal requirements to retain certain records for prescribed periods of time, all employees are required to act in accordance with the organization's Record Retention Policy and Schedule. During an investigation or ongoing litigation, employees may be directed to suspend the normal disposal of records. If you need help with managing your records, consult with your supervisor or contact your ministry or department's Records Lead.

Making Truthful and Accurate Records

ACT
JUSTLY

Employees shall complete and provide accurate and truthful work records. Employees may not omit material information, falsify or disguise the true nature of any transaction or forge or alter signatures or endorsements. Employees are also prohibited from approving a record or disclosure that is known to be false or misleading.

Examples of records covered by this Code include: maintenance records and inspection documents; vendor contracts and agreements; time records (including supporting materials to substantiate requests for time off); expense reports; purchasing statements; financial statements and reports to government agencies or the public.

Employees should ask their supervisors if they need clarification about expectations for making accurate records. Employees aware of inaccurate or deceptive records and disclosures must notify their supervisor, the Corporate Compliance Officer or make a report through EthicsPoint.

*Additional
Resources*

- **CRISTA's Document and Information Management Policy & Record Retention Schedule**

Preventing Workplace Violence

ACT
JUSTLY

We are committed to maintaining a safe and secure workplace. Acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage and similar activities are not tolerated. Employees who engage in acts or threats of violence may be terminated. Employees that feel that they are in immediate danger of workplace violence should call 911 and then contact their supervisor, as well as the organization's security personnel, if available at their work location. If not in immediate danger, notify your supervisor and contact Human Resources.

Q

What should I do if I have been threatened by a non-employee and I believe he or she may come to the workplace to harass or harm me?

A

You should notify CRISTA Security and Human Resources if you work on CRISTA's main campus. If you work off-campus alert your supervisor who will work with CRISTA headquarters for a safety plan until the situation is resolved.

*Additional
Resources*

- Employee Handbook, Workplace Violence Section

Complying with the Foreign Corrupt Practices Act

ACT
JUSTLY

We are an international organization and subject to the Foreign Corrupt Practices Act (FCPA). Under the FCPA, employees are prohibited from giving or offering anything of value to a foreign official or their family members, if the purpose of the gift is to willfully induce the recipient to obtain or retain a business relationship or otherwise secure an improper advantage. To ensure compliance with this act, employees must maintain a detailed account of organization transactions with foreign officials to demonstrate the accuracy and reliability of the organization's accounting records.

International employees should consult with designated ethics and accountability personnel for questions relating to their responsibilities under this Act. Other employees should consult with the Law & Corporate Affairs department before providing any gift, money, entertainment, service or other item of value to a foreign official inside or outside the United States.

Responsibly Using Social Media

WALK
HUMBLY

Employees who use social media (e.g. Facebook, Twitter, LinkedIn, Instagram, Snapchat, etc.) are subject to relevant organization policies, standards and procedures for protecting the organization's reputation, trademarks and logos. Employees are encouraged to consider that every social media interaction may directly or indirectly impact the organization's reputation. Employees are encouraged to promote organization events by posting them through social media in the format the organization has created to increase public awareness. However, when discussing other aspects of the organization, or providing opinions related to the workplace, employees should make clear that they are not authorized to speak on the organization's behalf, and the opinions are their own. Offensive or confidential content about the organization, its competitors, volunteers or those who we serve is noncompliant with this Code. Additionally, employees' personal participation with social media while at work should be confined to break periods when employees would otherwise conduct personal activities or business.

Additional Resources

- **Employee Handbook, Social Networking Section**



PROGRAM CONTACTS AND REPORTING OPTIONS

**CRISTA Human Resources
Department**
humanresources@crista.net

**Law & Corporate Affairs
Department**
legal@crista.net

**Corporate Compliance Officer
& HIPAA Privacy Officer**
legal@crista.net

**World Concern Ethics &
Compliance Reporting**
truth@worldconcern.org

Suggest improvement for our
workplace by submitting a
**Workplace Innovation Need
(WIN)** on the M68 Stewardship
CRISTAweb page

**CRISTA Senior Living
Compliance Contact**
206-546-7400



Telephonic or Online Reporting (Available 24 Hours a Day / 7 Days a Week)
1-888-530-6693 (toll free in the United States and Canada)
crista.ethicspoint.com