EXHIBIT: STANDARDS OF PRACTICE

SECTION I

Employees practicing with Company are expected to agree with and actively pursue the following in their personal life and professional practice.

SECTION II

OUR MINISTRY

Company provides a broad range of counseling services to individuals, couples, families, ministries, churches and the community at large within a safe, caring and compassionate atmosphere. We are called and committed to the application of sound Biblical principles to the challenges and problems of living. We strive to model and communicate the life-changing love, truth and grace of God's healing Word to hurting persons. We practice faith-based mental health.

Modern Christian counseling derives its basic orientation and authority first and foremost, from the Bible as the Word of God, which is the primary source of all wisdom and Christian spiritual formation; and secondly, from a balanced utilization of contemporary mental health therapies, the behavioral sciences, and sound clinical practice. Christian counseling, across the entire spectrum of care, is also intended to be holistic, purposefully taking into account the bio-psychosocial-spiritual assessment of individuals.

Furthermore, the treatment and prevention of mental/emotional/character disorders is aligned with the goal of moving toward Christian maturity and wellness. At its best, professional and ministry-based Christian counseling builds upon biblical truth and spiritual practice along with the relevant theoretical and practical contributions of various mental health traditions to help produce Christ-like character, behavior, and contentment in the lives of the people and systems that are served.

Christian Counselors

- Our Christian counselors are confessing believers and may also be duly licensed, credentialed, or certified mental health providers. We bring the life of Jesus Christ into the work of counseling.
- Christian counselors of all kinds when in the client's interest, with their consent, and when appropriate in the counseling process pray for and with clients; read the Bible and make reference to Scripture; encourage the confession of sin, the practice of forgiveness, and the making of amends; support the practice of the spiritual disciplines; and give assistance or make referral for spiritual interventions and other specialized practices.

When consent does not exist, Christian counselors may still be engaged in some of these activities silently and implicitly, always functioning in the best interests of their clients. These spiritual practices are not illegal, unethical, or illegitimate, nor are they antagonistic to the aforementioned clinical/ministerial purposes and practices. Christian counseling is not dichotomized into sacred and secular compartments, but from the perspective of the mental health professions, is rightly seen as holistic, adjunctive, and building upon the Word of God.

• This integrative work is a central aspect of the Christian counselor's lifelong challenge to become a helper of both excellence and ethical integrity. Christian counseling practice is not excessively complex, nor is it simplistic and reductionist. Christian counselors also understand and revere the spiritual dimension of human nature and change – best known through personally encountering Christ and growing in a life of faith in Him. They also diligently search for, evaluate, and apply the best data and practices of the behavioral and social sciences. Tying these various threads together in clinical and ministerial practice, Christian counselors understand and respect the role of cognitive, behavioral, moral, emotional, relational, spiritual, and environmental forces in human and social change. They invite God's presence and power to guide this change and to transform and sanctify the person being helped – properly using God's Word and the ministry resources of His universal church.

Common Values, Practices, and Ethics

- Christian counselors accord the highest respect to the triune God revealed in the Holy Scriptures the foundation of faith and ethical conduct. They are also dedicated to the best interests of their patients and clients, to the law and the ethical standards of their respective clinical and ministerial disciplines, to their contractual obligations in the church and workplace, and to proven research and data from the bio-psycho-social sciences. A client's right to self-determination and the opportunity to be treated with respect regarding matters of faith and a Judeo-Christian worldview, is strongly advocated.
- However, regardless of religious creed or preferred clinical theory, Christian counselors are bound together by the following common goals and ethics: knowing and loving God; loving and serving others; avoiding all harm toward clients and others; bringing truth, healing, and agreed upon change into people's lives; assisting people in being set free from sin, spiritual bondage, mental disorders, and emotional distress; making peace and doing justice; and assisting the church, community, and profession to grow to their full maturity.
- Christian counselors strive to come alongside those seeking help, listen with heart, mind and spirit, and speak the truth-in-love to those served. They are dedicated to listen carefully to clients, to respect them, to understand their hurts, sins, and fears, and to

- encourage faith, hope, and love. Christian counselors humbly challenge client distortions and wrongdoing and, by mutual consent, help clients renounce the ways of sin in order to support change in the direction of growth and maturity in Christ. They offer the empathic heart of understanding, the consoling voice of comfort, the guiding hope of godly reason, and the assertive challenge to change depending on what is needed within the therapeutic process.
- Christian counselors are committed to disciplined learning and faithful growth in counseling knowledge, gifts, and skills. When appropriate, Christian counselors testify to the saving grace and sanctifying power of Jesus Christ. They avoid imposing their values and beliefs on clients, but on the other hand, they are not silent about God's love, mercy, and grace. Christian counselors strive to maintain their integrity to Christ and His revelation in Scripture, while also contributing to the growth of psychological knowledge and clinical skill that is inherent to all counseling practice and development. They are dedicated to a continual evaluation and improvement of their practices in order to fulfill the call to excellence as mental health practitioners and as Christian counselors.
- Christian counselors serve their clients with excellence and ethical integrity practicing with the utmost respect, sensitivity, honesty, energy, and capability. They do not use clients for their own personal gain and strictly avoid all client harm and exploitation. They avoid activities that violate or diminish the civil and legal rights of clients and client systems. They do not discriminate in the provision of client services even if ethical referral is all that is done on the basis of gender, race, ethnicity, disability, religious creed, denomination, socio-economic status, national origin, or sexual orientation.
- Aspiring to honor Christ in all things, Christian counselors are committed to moral purity and honesty and to maintain personal, professional, and organizational integrity. Aspiring to excellence in service, they know and respect the limits of their competence, offer consultation, make appropriate referrals, network with other service providers, and continually study to improve their excellence in service to Christ and to others. Christian counselors maintain professional integrity in relations with the state, with licensing boards, with the church, with professional and ministerial associations, and with employers and colleagues. They understand both their duties to the state and other organizations, and the limits of the authoritative powers these states and private institutions hold.
- Christian counselors have the right a right grounded in Scripture and protected by the religion, association, and free speech clauses of the First Amendment and the Fourteenth Amendment to the United States Constitution to identify publically as Christian counselors and to always maintain this integrated clinical-spiritual practice regardless of professional association and/or licensure status. This right to explicit Christian counseling practice cannot be abrogated or substantially diminished by any court, state legislature, licensure board, or professional association.

The Christian Counseling Profession

- Christ is the bridge by which Christian counseling integrates both spiritual ministry and professional mental health practice. Since all truth is from God, Christian counseling facilitates understanding and integration between empirical truths of general revelation and the truth of God's special revelation in Christ. Christian counseling is an emerging profession that is distinctive in its ministry to Christendom and society-at-large, wherein people are able to identify as Christian counselors and grow in their personal and professional lives. It is also an interdisciplinary organism by which unity in Christ is genuinely possible. It holds out the potential of overshadowing the turf-protecting enmity and professional prejudice that often infects relationships between people and disciplines of ministry within the church as well as the larger world of mental health.
- In Christ, helpers across the entire spectrum of Christian counseling, are challenged and encouraged to stand together in mutual respect and humble service able to proclaim both their professional distinctive and their common Christian mission. In Christ and in Christian counseling we have all been given this sacred trust to care for those who are hurting and in need of comfort and therefore, we all stand together.

Faith-Based Counseling & State-Licensure

MyCounselor.Online provides faith-based, specifically Christian, counseling online.

Our clients are referred to us by Christian organizations and find us online through web searches for Christian counseling. Their intent to receive religious based counseling as an expression of their free exercise of religion is expressed through their seeking referral through a faith organization or web search for faith-based counseling. It is further affirmed through written consent to religious-based counseling in our informed consent documents prior to the start of therapy and through verbal informed consent during their first session.

As providers of religious based counseling the services we provide require no government licensure at the state or federal level. Religious based counseling is not regulated by the government by virtue of the free exercise clause of the first amendment to the U.S. Constitution.

Written Informed Consent

At MyCounselor.Online we believe informed consent is very important. We endeavor to make clear in all of our marketing material the religious nature of the counseling we provide and we further make it explicitly clear in our written informed consent that all clients sign prior to receiving services. Below is the "Informed Consent to Christian Counseling" section of our written informed consent documents, as amended from time to time.

The Counseling We Provide

MyCounselor.Online is a faith-based provider of Christian Counseling for mental health and personal development primarily online over the internet using video conferencing technology.

As a provider of religious counseling services our services are not regulated by any state or federal government agency by virtue of the free exercise clause of the first amendment to the U.S. Constitution, protecting religious liberty.

Consent to Christian Counseling

In signing this document and accepting services from MyCounselor you acknowledge your intent to receive religious-based counseling in accordance with the free exercise of your religion. Further, you grant permission for MyCounselor to provide services in accordance with the principles of Christian Counseling as defined in the MyCounselor. Online Statement of Faith and the American Association of Christian Counselors Code of Ethics 2014.

State-Licenses

Although not required for providing religious-based counseling, MyCounselor.Online believes the education and experience standards for mental health state licensure are valuable benchmarks for the training of counselors. Thus, our internal certification process is built to meet or exceed the mental health state-licensure requirements in all 50 states. We also encourage and facilitate our counselors in pursuit of licensure in the states they physically reside.

Regardless of what state licensures employees may hold, the counsel provided through their employment with MyCounselor. Online is religious-based counsel protected under the free exercise clause of the first amendment to the U.S. Constitution and is not in capacities related to their state-license.

If your counselor is state-licensed, they will be licensed in the state(s) in which they physically practice. They may not be licensed with the state you are physically present in when accessing services via online counseling. Regardless of where you physically are when accessing counseling services online, we understand you to be "coming to" your counselor, by way of the technology, in the state they are physically present. By electing to receive services you consent to counseling with this understanding. You can find the state licensure status for each counselor under their profile on our website.

Terms

The terms, counsel, counseling, therapy, religious-based counseling, faith-based counseling, and Christian counseling, as used by MyCounselor.Online, are interchangeable and refer to the delivery of religious-based counseling provided to you in accordance with your free exercise of religion.

The terms counselor and therapist are also used interchangeably and refer to employees and contractors of MyCounselor. Online who provide religious-based counseling services to clients and who may or may not be state-licensed mental health providers. Our use of the adjective 'professional' is intended to communicate the quality of professionalism our counselors provide services with and is not a reference to state-licensure.

Verbal Informed Consent

In addition to our written informed consent document we further make clear the nature of the counseling we provide and any license our counselors may hold through verbal informed consent during a client's first appointment with one of our counselors. Below is our verbal informed consent script, as amended from time to time:

"Before we get started there are a couple matters of informed consent that are important for us to go over. The first, as you probably already know, is that as a counselor at MyCounselor.Online I provide faith-based counseling, specifically Christian counseling. I don't impose my values on my clients; however, my values do influence the way I work. It is also important that you know that religious based counseling, under the first amendment, is not regulated by the state or federal government. Even though I am providing religious based counseling I hold myself to the same high standards of professionalism you might find at a secular practice. It's also important that you would know that I am licensed as a _____ in the state of _____. Do you have any questions about any of these matters I can answer for you?

...Great, how can I be of help?"

Health Care Provider Taxonomy Code

The Healthcare Provider Taxonomy Code Set is a hierarchical code set that consists of codes, descriptions, and definitions. The Code Set is maintained by the National Uniform Claim Committee and is a Health Insurance Portability and Accountability (HIPAA) standard code set. As such, it is the only code set that may be used in HIPAA standard transactions to report the type/classification/specialization of a health care provider when such reporting is required.

The code 101YP1600X is a *Level III - Area of Specialization taxonomy code* is used to describe a counselor grouped under behavioral health & social service providers with a specialization in pastoral.

The services provided by MyCounselor.Online are currently best identified as falling under the health care provider taxonomy code **101YP1600X - Counselor – Pastoral**. Every MCO counselor is required to have a National Provider Identifier (NPI) with the primary taxonomy set to 101YP1600X.