

### from the executive chairman and ceo & president





At TeamHealth,\* our commitment is to provide the best place for patients to receive care, physicians to practice medicine, and employees to work. We have made a strong commitment to conduct ourselves with integrity to ensure that our work is done in an ethical and legal manner. We are, therefore, excited to introduce you to the TeamHealth Code of Conduct.

Attestation to exemplary ethics and integrity should be an integral part of our daily lives. We truly believe TeamHealth-affiliated individuals are among the best, brightest, and most ethical people in the

workplace today. For an individual or an organization, there is no asset more important than a sterling reputation. We must never tarnish our reputation by becoming involved in business practices that are illegal or unethical.

Integrity is vital to all we do. At TeamHealth, we attempt to uphold the highest ethical standards. In your relationship with TeamHealth, you will not be asked to do anything that is illegal or unethical. We will be glad to support anyone who is doing the right thing regarding medical practice and business.

Every day, it is obvious that ethical boundaries can become blurred. The purpose of the TeamHealth Code of Conduct is to refocus each of us on what is right for our position.

Whether you are a physician practicing medicine, a coder assigning diagnosis codes, or a receptionist greeting our clients, the ability to make sound decisions and exercise good judgment is essential. If you have questions regarding the TeamHealth Code of Conduct, you should immediately consult your supervisor, another member of management at your location, your division leader, or the Chief Compliance Officer. You may also call our toll-free Compliance Hotline at 1.888.315.2362. You have our personal assurance there be will no retribution for asking questions or raising concerns about the TeamHealth Code of Conduct or for reporting possible improper conduct.

Thank you, and congratulations on choosing to work with a quality organization that holds ethics and integrity at the highest level of appropriate behavior. Please remember that you are the most important part of our organization and that ethical practices truly begin with each of us.

Sincerely,

Lynn Massingale, M.D., FACEP Executive Chairman TeamHealth Leif Murphy
CEO & President
TeamHealth

<sup>\*</sup> The term "TeamHealth" as used throughout this TeamHealth Code of Conduct includes TeamHealth, Inc., and all of its related entities, companies, affiliates, and subsidiaries. Any reference to TeamHealth physicians denotes physicians who are independent contractors or employees under contract with TeamHealth-related entities, companies, affiliates, or subsidiaries.





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# The Purpose

The purpose of the TeamHealth Code of Conduct is to provide TeamHealth directors, officers, employees, and affiliated independent contractor medical professionals (referenced individually as an "Associate" and collectively as "Associates") with a concrete framework within which to make important decisions regarding their areas of responsibility.

Included in the Code of Conduct is a decision-making model. This model is designed to help Associates think clearly and rationally through complex decisions that arise on a regular basis.

While the Code of Conduct addresses many issues that are of ethical, legal, or practical pertinence to TeamHealth, it is not all-inclusive. There may be circumstances for which an Associate could be responsible that may arise but are not covered in the Code of Conduct. If you encounter a situation that is not clearly defined in this Code of Conduct, please consult your immediate supervisor. In the event you are not able to discuss this situation with your immediate supervisor, you may contact his or her supervisor, a member of Human Resources, the Corporate Compliance Department, or the Compliance Hotline at 888.315.2362.

TeamHealth is committed to compliance with the federal anti-kickback statute, the Stark Law, the False Claims Act, the Health Insurance Portability and Accountability Act (HIPAA), Deficit Reduction Act, and other applicable federal, state, and local laws, rules, and regulations governing the healthcare industry.

To ensure that TeamHealth is in compliance with all state and federal laws, we provide ongoing training on the contents of this manual as well as offer some applicable situations. Each Associate is required to participate in this training annually. Failure to participate in the Compliance and Integrity training will result in progressive disciplinary action up to and including termination. All independent contractors are requested to participate in compliance training on an annual basis unless otherwise specified within their contract.

There are additional materials in this manual that will guide you through the process of ethical reasoning. It is important that you read this document in its entirety.

The Code of Conduct is not an employment contract and should not be construed as such. TeamHealth employees are considered "employees at will" (unless prohibited or restricted by state laws).



### **Compliance Program Structure**

TeamHealth and its Associates are committed to conduct all business activities in compliance with applicable laws and in conformance with the highest ethical standards. To reinforce this commitment, TeamHealth has established a compliance program. An overview of this program is accessible on www.teamhealth.com or TeamNet. The program has the following goals:

- Heighten awareness of compliance and ethical issues
- Provide Associates with avenues for addressing compliance and ethical issues
- Oversee the activities of TeamHealth and its Associates with regard to compliance with laws, regulations, company policies, and the Code of Conduct

The compliance program is designed as in integral part of a "top-down" structure that begins with the Board and the Executive Chairman and flows throughout the organization so that it applies to all Associates. The Board oversees TeamHealth's activities with respect to issues of regulatory compliance and ethics to ensure that high standards of business, medical, legal, and personnel ethics are met within the organization.

The Executive Compliance Committee is a committee consisting of TeamHealth executives from various

functions that provide policy auidance to the Board. The Chief Compliance Officer is responsible for implementing all necessary actions to achieve the objectives of the compliance program, including oversight of compliance-related training programs, assessment review of potential compliance issues, and reinforcement of the Code of Conduct and organization policies.

Waivers to any of the provisions of the Code of Conduct must be in accordance with TeamHealth policies and conditions. Any waiver of a provision made for an executive officer of a member of the Board may be made only by the Board and must be promptly disclosed to shareholders.

### **Resources for Guidance and Reporting Violations**

To obtain guidance on an ethical or compliance issue or to report a suspected violation, you may choose from several options. We encourage the resolution of issues at a local level whenever possible. It is expected good practice to raise concerns first with your supervisor, assuming that you are comfortable with this approach and think it appropriate under the circumstances. TeamHealth recognizes that there may be times when Associates' concerns cannot be properly addressed through the normal chain of command. In such circumstances, Associates are encouraged to report concerns to their supervisor, Human Resources, the Chief Compliance Officer, or the Compliance Hotline. TeamHealth has initiated four options for this purpose. All are 24 hours a day, 7 days a week, to report any violation of law, regulation, organization policy, or the Code of Conduct.

Contacts with the Hotline will not be traced or recorded. Inquiries to the Hotline may remain anonymous. If callers choose to identify themselves, their confidentiality will be protected to the fullest extent permitted by law. Retaliation or retribution against any Hotline caller is strictly prohibited. However, Associates who are found to have knowingly and deliberately made false accusations against other Associates shall be subject to disciplinary actions up to and including termination. Calls to the Hotline do not protect callers from appropriate disciplinary action regarding their own performance or conduct.

The Chief Compliance Officer will thoroughly review, evaluate, and respond to allegations of wrongdoing, concerns, and/or inquiries made to the Hotline in an impartial manner. The Chief Compliance Officer will respect and protect the rights of all Associates, including any Associate who is the subject of a Hotline complaint. To this end, all allegations will be thoroughly investigated and verified before any action is taken. Furthermore, any disciplinary action or other response resulting from a call will be kept confidential by the Hotline staff.



### PERSONAL OBLIGATION TO REPORT

TeamHealth and its Associates are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the organization. Each Associate has an individual responsibility to report any activity by any Associate, physician, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, this Code of Conduct, or any TeamHealth policies. TeamHealth has no tolerance for any person or persons who retaliate against those who make inquiries or report matters of concern regarding compliance matters.

### **ACKNOWLEDGEMENT PROCESS**

TeamHealth requires all Associates to sign an acknowledgment confirming that: (1) they have received the Code of Conduct, (2) they have had an opportunity to have any questions regarding the Code of Conduct answered, (3) they understand that TeamHealth has established a Hotline and that they have an obligation to report any suspected violation of the Code of Conduct to TeamHealth's Chief Compliance Officer, and (4) they agree to adhere to the principles and objectives of the corporate Compliance Program and related policies found on TeamNet under "Compliance Program." New Associates will be required to sign this acknowledgement.

Adherence to the Code of Conduct and participation in related activities and training will be considered in decisions regarding contractual job responsibilities, promotion, and compensation for all candidates and colleagues.

TeamHealth requires that all independent contractors sign an acknowledgement confirming that (1) they have received the Code of Conduct, (2) they have had an opportunity to have any questions regarding the Code of Conduct answered, (3) they understand that TeamHealth has established a Compliance Hotline, and (4) they have an obligation to report any suspected violation of the Code of Conduct and related policies to TeamHealth's Chief Compliance Officer.







### **Hotline**

### **HOTLINE DESCRIPTION**

The TeamHealth Compliance Hotline provides you with three avenues through which you can address any ethical questions or concerns: a toll-free phone line, a fax, and a website. The hotline can:

- Enable you to be heard/direct your concerns to the right person(s)
- Help with the Code of Conduct
- Provide a vehicle for reporting illegal activities
- Provide a vehicle for reporting questionable matters, non-compliance with applicable legal requirements, and retaliation against Associates who in good faith make accounting or legal allegations
- Promote the fair and equitable treatment of Associates
- Provide assistance with ethical issues and/or decisions

### HOURS OF OPERATION

The TeamHealth Compliance Hotline is a resource that is available to you 24 hours a day, 7 days a week. There are several avenues to report Hotline concerns:

- Telephone 888.315.2362
- TeamShare link "Compliance Hotline"
- Website: www.mycompliancereport.com (access ID: THH)
- Fax 865.293.5494
- Writing to:

CONFIDENTIAL – Attention: Chief Compliance Officer TeamHealth 265 Brookview Centre Way, Ste 400 Knoxville, TN 37919

In addition, any Associate may, in his or her sole discretion, report any accounting allegation, legal allegation, or retaliatory act allegation directly to the Audit Committee of the Board of Directors, the Board of Directors, and/or the General Counsel by indicating such a request when accessing the toll-free telephone line, fax, or website described above or by emailing Corporate\_Secretary@teamhealth.com or writing to:

CONFIDENTIAL
Attention: General Counsel
TeamHealth
265 Brookview Centre Way, Ste 400
Knoxville, TN 37919

A HOTLINE WALLET CARD IS AVAILABLE ON THE LAST PAGE OF THIS BROCHURE.

Hotline



To the extent possible, any reports should be factual rather than speculative or conclusory and should contain as much specific information as possible to allow for proper assessment. Ideally, all reports should contain sufficient corroborating information to support the commencement of an investigation, for example, including the names of individuals suspected of violations, the relevant facts of the violations, how the complainant became aware of the violations, any steps previously taken by the complainant, who may be harmed or affected by the violations, and, to the extent possible, an estimate of the misreporting or losses to TeamHealth as a result of the violations.

### NON-RETALIATION POLICY

TeamHealth encourages Associates and other persons to report, in good faith, any accounting allegations, legal allegations, or any other activities believed to be in violation of applicable legal and regulatory requirements, TeamHealth policies and procedures, or the Code of Conduct. No action or retaliation will be taken against any Associate who makes a report in good faith even if the facts alleged are not confirmed by subsequent investigation.

### CONFIDENTIALITY

The Hotline is completely confidential (to the maximum amount of confidentiality provided by applicable law). There is no caller ID to identify from where you are calling. You may choose to identify yourself, or you may remain anonymous.

Unless necessary to conduct an adequate investigation or compelled by judicial or other legal process, neither TeamHealth, the Audit Committee, nor any director, officer, or Associate of TeamHealth shall: (i) reveal the identity of any person who makes a report and asks that his or her identity remain confidential or (ii) make any effort to ascertain the identity of any person who makes a report anonymously.

## **Professional Conduct/Fair Dealing**

It is understood that Associates of TeamHealth will exhibit appropriate professional conduct in all situations. Associates are expected to:

- Follow all local, state, and federal laws that apply to appropriate professional conduct
- Conduct all professional business in a fair and ethical manner in accordance with honesty, fairness, trust, and integrity
- Be truthful and not deceptive in professional relationships
- Not participate in fraudulent activities
- Not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material fact, or any other unfair-dealing practice
- Accurately complete and timely file all reports and other information required to be given to any federal, state, or local government agency
- Report any practice that may violate a law, rule, regulation, safety standard, company policy, or this Code of Conduct to the appropriate level of TeamHealth management or to the Hotline or Board
- Assure that all political activities and contributions conform with the organization's policy







### FAIR BUSINESS RELATIONSHIPS

TeamHealth values the relationship it has developed with its Associates and hospital patients. It is imperative that we continue to treat these individuals with the same respect and professionalism regardless of financial or other considerations. Some questions you might have are as follows:

- **Q.** Delivering quality medical care is expensive. Sometimes Medicaid patients require the most attention and give the company the least amount of money. Is it OK to give them less attention?
- **A.** No. Associates of TeamHealth are required to treat all patients with the same respect and quality of care regardless of economic factors such as ability to pay.
- **Q.** As an emergency physician I treat patients at all levels of acuity. However, I have a colleague who wants to pick and choose patients, only taking the more challenging cases (high trauma, high acuity, etc.). How should I handle this?
- **A.** At TeamHealth, we expect all affiliated physicians to treat their patients, colleagues, and staff fairly and respectfully. You should bring this situation to the attention of your facility medical director.

### **VENDOR RELATIONSHIPS**

TeamHealth develops numerous vendor relationships in the course of business. It is vital that these relationships be established and maintained in a fair manner that is compliant with all federal, state, and local laws governing vendor relations, contracting, etc. This fairness can be achieved by avoiding conflicts of interest, obtaining competitive bids, dealing with only quality vendors, and treating vendor quotes as proprietary information. Some questions you might have are:

- Q. I believe someone got a contract because he/she is dating the manager. Is that all right?
- **A.** No. Contracts should be awarded on merit after clearance through an Office of Inspector General/General Services Administration (GSA) database check. A dating relationship would be considered a conflict of interest in this situation. The manager should recuse or disqualify himself/herself from the contract selection process.
- **Q.** Our radiology business unit is purchasing new transcription equipment for our teleradiology program. As the radiologist in charge, vendors are constantly trying to influence my decision. I am not responsible for the actual purchase. What level of input should I have in this process?
- **A.** As a radiologist, your input is critical; the medical specifications relating to the purchase must be shared with the purchasing agent. However, you should refer the vendors to the purchasing agent to schedule demonstrations or presentations.



# **Government Inquiries**

It is TeamHealth's policy to cooperate fully with all government inquiries. All government inquiries or contacts are to be routed to the Chief Compliance Officer and the General Counsel. TeamHealth Associates should consult the TeamHealth "Response to Investigations" policy (see TeamNet, Compliance Program Policies) and immediately contact their supervisor, the Chief Compliance Officer, and General Counsel at TeamHealth's corporate office for further guidance before responding to such inquiries.

TeamHealth Associates must never:

- 1. Destroy or alter any company document or record in anticipation of a request for the document or record by a government agency or court
- 2. Lie or make false or misleading statements to any government investigator
- 3. Attempt to persuade another TeamHealth Associate, employee, or any other person to provide false or misleading information to a government investigator or to fail to cooperate with a government investigation

### INQUIRIES AND INSPECTIONS

TeamHealth cooperates fully with all government agency inquiries and inspections. Associates are to be pleasant and cooperative when responding to any such inquiry or participating in any such inspection. Questions you might have are:

- Q. I received a call from the Office of Inspector General. What should I do?
- **A.** Obtain contact information and politely request the opportunity to have the appropriate person from TeamHealth return the call. Contact the Compliance Department and the General Counsel immediately. He/she will ensure that the appropriate area handles the inquiry.
- Q. The Unemployment Board contacted me regarding a former employee's employment with the organization. What should I do?
- **A.** Obtain contact information and politely request the opportunity to have the appropriate person from TeamHealth return the call. Contact the Compliance Department and the General Counsel immediately. He/she will ensure that the appropriate area, in this case the Human Resources Department, handles the inquiry.

### **Patient Care**

Our organization is dedicated to delivering quality patient care. Clinical practitioners should always follow federal, state, and local laws in their practice. Each of us is responsible for maintaining the integrity and quality of our individual job performance.

The medical profession has a code of conduct that is unique to its profession. The following policies are meant to supplement, not replace, that code of conduct for Associates who are healthcare providers.

### PATIENT CONFIDENTIALITY

Protecting and ensuring patient confidentiality is essential to quality patient care. It is imperative that all clinical and non-clinical associates understand the importance of confidentiality and the need to comply



# Patient Care



### TEAMHEALTH CODE OF CONDUCT

with HIPAA regarding protected health information (PHI). Breaches of a patient's confidentiality may place the organization in a position of liability, may cause us to lose valuable client relationships, and may result in loss of confidence in our organization and the healthcare industry in general. Therefore, TeamHealth is committed to protecting the confidentiality of the patient and patient records in all patient/provider contexts. Questions that you might have are:

- **Q.** I have discovered that a patient has tested HIV positive. My concern is the possible exposure to the staff. Am I allowed to alert the staff to a patient who is HIV positive?
- **A.** No. Patient records are strictly confidential. It is inappropriate to share this information with anyone who is not authorized to receive it. Medical information should only be shared on a strict need-to-know basis and then only the minimum amount of information required. However, the patient may have given written authorization to share the results of the test. Confirm whether there is an authorization prior to sharing the patient's information. Any doubts should be resolved in favor of the confidentiality of such information. If you need further guidance, please contact your supervisor.
- **Q.** I overheard a physician sharing patient record information regarding an adult child (18) with the patient's mother. I am a nurse practitioner and do not want to lose my job. What is the appropriate plan of action?
- **A.** You should go to your supervisor with the information. If that is not possible, then contact the department manager, the corporate Compliance Department or the Compliance Hotline.

### **QUALITY OF CARE**

Patients who are treated by affiliated providers should receive quality care regardless of the financial circumstances. Patient care should be an experience that resolves the patient's healthcare problem, allows the patient to feel better, and provides healthcare satisfaction in a compassionate and ethical manner. Quality of care should not be based on payer information. TeamHealth-affiliated providers follow the Emergency Medical Treatment and Active Labor Act (EMTALA), which requires that, regardless of the patient's ability to pay, we provide an emergency medical screening exam to all requesting patients who present themselves to a hospital emergency department where affiliated providers practice. If the provider or hospital determines that the patient has an emergency medical condition, the hospital must provide either stabilizing treatment within its capabilities or transfer the patient to another facility that has agreed to accept the patient for a higher level of care. We do not admit or discharge patients simply based on their ability to pay. Questions you might have are:

- **Q.** I have heard physicians complain about certain payer types of patients. These physicians purposely spend less time with the patients who are economically disadvantaged. What should I do?
- **A.** Providers affiliated with TeamHealth should provide the same level of quality patient care to all patients regardless of ability to pay. You should contact the medical director, the corporate Compliance Department, or the Compliance Hotline.
- **Q.** As a provider, I understand the need to deliver prompt care. However, I am concerned that I do not have adequate time to spend interviewing, diagnosing, and treating patients. How should I handle this?
- **A.** Please direct your inquiry to the facility medical director. He/She can give you guidance on how to resolve this issue.



### **Treatment of Associates**

TeamHealth strives to provide Associates with a safe and pleasant place to work. In turn, it is each Associate's responsibility to exhibit conduct that is professional, ethical, respectful, and honest to all others, including fellow Associates, employees, customers, patients, vendors, etc. TeamHealth will not tolerate any form of discrimination on the basis of race, creed, religion, gender, age, disability, national origin, or other basis. TeamHealth will not tolerate any behavior that can be construed as harassing or contributing to a hostile work environment. TeamHealth is dedicated to providing Associates and potential Associates with an environment free of harassment and/or discrimination.

### HARASSMENT FREE WORKPLACE

Each TeamHealth Associate has the right to work in an environment free of harassment. TeamHealth will not tolerate any form of harassment, sexual or otherwise, by anyone. Associates are to be treated fairly and with respect in all situations. Associates are also expected to treat others with respect and fairness. If an Associate experiences workplace harassment, he/she should go to his/her supervisor. If the Associate is not comfortable discussing the situation with his/her supervisor, he/she may go to that individual's supervisor or, if an employee, contact Human Resources. If the Associate feels that the concern has not been addressed adequately, he/she may also contact the Compliance Department or the Hotline. Questions you might have are:

- **Q.** My supervisor has asked me out for drinks after work. My supervisor says this will improve my performance and enhance my business opportunities. What should I do?
- **A.** Explain to your supervisor that this behavior makes you uncomfortable and you do not want to be asked again. If this does not work, go to your supervisor's supervisor or contact Human Resources. You may also contact the Compliance Department or Compliance Hotline.
- **Q.** Someone in my department is always telling dirty jokes. It really offends me. I am afraid to tell anyone because this person is the top salesperson and has been with the company for years. What should I do?
- **A.** Ask the person to stop and explain how the dirty jokes offend you. If this doesn't work, speak with your supervisor, your supervisor's supervisor, the Human Resources Department, or the Compliance Department. You may also contact the Hotline with your concern.
- **Q.** I am a physician assistant, and I work with a physician who continually makes comments about parts of my anatomy. The other day he actually picked me up (physically). I told him this was harassment and to stop, but the physician continues the behavior I find offensive. How should I handle this?
- **A.** Please take this situation to your supervisor. If he/she is not available or accessible, please notify Human Resources. You may also contact the Compliance Department or the Hotline with your concern.

### **EQUAL EMPLOYMENT OPPORTUNITY**

TeamHealth does not discriminate against applicants or Associates on the basis of race, creed, religion, age, gender, national origin, disability, or other basis with respect to any aspect of employment. TeamHealth strives to provide a work environment that is diverse and free from discrimination. We do not discriminate against any individual with a disability with respect to any offer or terms/conditions of employment. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities. Further, all Associates are expected to comply with and support this policy. Questions you might have are:







**Q.** I am an assistant manager, and I applied for a manager position. I did not get the position, and I am concerned that I have not gotten promoted based on my gender. What should I do?

**A.** You should discuss this with your supervisor. Often in cases such as these, there are circumstances of which you may not be aware. If you still do not have resolution, you should contact your Human Resources office.

**Q.** A member of senior management has told me that he/she does not want to interview certain applicants based on appearance, e.g., obesity, gender, age. How do I handle this?

**A.** Explain to the manager that TeamHealth recruits based on job-related criteria and is an equal opportunity employer. It is not acceptable to eliminate applicants based on criteria that are not job-related. If the person does not concur, report the situation to Human Resources. If you are uncomfortable using this route, you may also contact the Compliance Department or the Hotline.

### DRUG AND ALCOHOL ABUSE

TeamHealth is committed to an alcohol- and drug-free workplace to protect the interests of its Associates and patients of hospital clients. TeamHealth prohibits the use, presence in the body, sale, distribution or possession of alcohol, illegal drugs, or drugs not prescribed for the Associate while working or present on company or client property.

TeamHealth reserves the right to require an Associate to submit to drug or alcohol tests in any of the following situations:

- Following an on-the-job injury
- Reasonable suspicion of a violation of this policy
- Follow-up to a substance abuse treatment program

Q. I suspect a co-worker of coming to work under the influence of drugs. What should I do?

**A.** According to TeamHealth policy, you should report this to your supervisor. Persons at work while under the influence are a hazard to themselves and others.

Q. My supervisor has asked me to submit to a drug/alcohol test. Can he/she make me take this test?

**A.** TeamHealth's policy does state that Associates are to be drug and alcohol free while at work. We may use drug testing as a means of enforcing this policy.

### **INELIGIBLE PERSONS**

Our organization does not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal/state healthcare programs, is suspended or debarred from federal government contracts, and has not been reinstated in a federal/state healthcare program after a period of exclusion, suspension debarment, or ineligibility. Our organization routinely searches applicable government lists of ineligible or excluded persons. Associates and vendors are required to report to the Compliance Department if they become aware of an exclusion, suspension, or debarment of any individual, including themselves.



### ASSOCIATE HEALTH AND SAFETY

TeamHealth strives to provide a work environment that is safe and free from occupational hazards to its Associates. TeamHealth prohibits Associates from bringing firearms or other weapons on company or client property. Associates who bring firearms or other weapons on company or client property are subject to disciplinary action up to and including termination.

TeamHealth's goal is to provide a safe place for Associates to work and patients to receive care. TeamHealth complies with all federal, state, and local laws pertinent to health and safety. It is important that you advise your supervisor or Human Resources of any serious workplace injury or any situation presenting a danger or injury so that timely corrective action can be taken. Questions you might have are:

- Q. A coworker has a heater in her office that has a frayed cord. I often see sparks come from it. What should I do?
- A. Report this incident to your supervisor.
- Q. A coworker came to work with yellow discoloration of the skin and pupils. She said she thought she had hepatitis. What should I do?
- A. Notify your supervisor immediately. This could be a critically contagious situation.
- Q. I went to lunch with a coworker and became aware that he/she carries a loaded revolver at all times. Is this appropriate?
- A. No. TeamHealth has a policy prohibiting Associates to carry firearms or weapons on company or client property. You should report this to your supervisor or the Human Resources Department.
- Q. The hospital where I am a provider requires all providers to submit to "universal precautions." However, I have seen a fellow physician violate "universal precautions" by not wearing protective gear. This is not only a potential threat to his/her health, but also to the health of the patient. How should this be handled?
- A. This matter should be submitted to your medical director, whose appropriate response should be to reiterate the need to comply with "universal precautions."

# **Occupational Health and Safety**

### **OVERVIEW**

In coordination with its clients, TeamHealth complies with all occupational safety and health standards and all rules, regulations, and orders issued under the Occupational Safety and Health Administration (OSHA) that are applicable in order to ensure workplace safety. TeamHealth has implemented a formal Exposure Control Plan to cover its Associates that includes the exposure determination required by law. This plan includes the following: (i) a list of all job classifications in which all Associates have occupational exposure to bloodborne pathogens; (ii) methods of implementation for methods of compliance, Hepatitis B vaccination, communication of hazards to Associates. and recordkeeping; and (iii) procedures for evaluating exposure incidents to include failure of controls. All TeamHealth Associates impacted by OSHA are provided with training and information about workplace safety and the procedures to follow in the event of a workplace safety incident.







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### **EDUCATION AND TRAINING**

OSHA compliance training will be provided when each Associate begins work with TeamHealth and on a regular basis thereafter. OSHA training shall include the following:

- (1) Reading of the OSHA poster at the job site
- (2) Compliance with all applicable OSHA standards
- (3) Awareness of worksite safety and health rules and regulations and the wearing or use of prescribed protective equipment while working, as applicable
- (4) Awareness of obligation to report hazardous conditions to the supervisor or department manager
- (5) Awareness of obligation to report any job-related injury or illness to the supervisors or department manager and to seek treatment promptly
- (6) Cooperation with the OSHA compliance officer conducting an inspection if he/she inquires about safety and health conditions in the workplace
- (7) Obligation to exercise rights under OSHA in a responsible manner

### LICENSE AND CERTIFICATION RENEWALS

Associates (both employees and independent contractors) who are in positions that require professional licenses, certifications, or other credentials are responsible for maintaining current professional credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. To ensure compliance, TeamHealth may require evidence of the individual having a current license or credentials.

TeamHealth will not allow any licensed employee to work without a valid, current license.

### **Environmental Compliance**

TeamHealth is committed to:

- Adhering to applicable federal, state, and local environmental laws, regulations, and requirements
- Operating in a manner that protects human health and the environment and integrating pollution prevention into planning and decision-making
- Objectively and fully communicating environmental protection information to staff, subcontractor personnel, customers, applicable stakeholders, and the public
- Continuously improving our processes, systems, and capabilities so that we can increase the value of our services



### **Treatment of Confidential Information**

TeamHealth understands the critical nature of confidential information. The following list, while not complete, represents an example of files/documents that are considered strictly confidential and should not be shared with anyone who is not authorized to view such data.

- Protected health information (PHI)
- Employee wage information
- Employee personnel record information
- TeamHealth financial data (financial statements, general ledger data, cash management information, etc.)
- Patient records
- Marketing strategy
- Investor information
- Mergers and acquisitions information
- Portable device information downloaded from TeamHealth

To ensure consistent, accurate delivery of TeamHealth information, only TeamHealth-designated individuals can speak for the organization and/or represent the organization to the media, investors, analysts, etc. Before publishing, making speeches, giving interviews, or making public appearances that are connected to business interests, you must obtain approval, in advance, from your supervisor and the Vice President of Communications. If you have questions regarding the dissemination of information, please speak with your supervisor. Disseminating confidential information will result in disciplinary action up to and including termination.

### PROTECTED HEALTH INFORMATION

All patient information (e.g., records, diagnoses, payer data) must be held in the strictest of confidence and should only be accessed as professionally required to render appropriate care and treatment. (See the HIPAA handbook under "Compliance" on TeamNet.)

- **Q.** I recently saw a patient with whom I went to high school. I thought she was attractive and would like to pursue the relationship. Is it OK for me to look up her patient record to get her home telephone number?
- **A.** Referring to the patient record for any reason, other than treatment and billing, is prohibited. That would be a misuse of confidential information and could lead to disciplinary action up to and including termination.
- **Q.** A friend of mine came to the clinic for routine blood work. It was determined that she is HIV positive. She is currently dating my brother. What can I do?
- **A.** You are to keep the information confidential. While this may appear to be a conflict to you, please understand that you have an ethical obligation to adhere to confidentiality requirements.





# EMPLOYEE INFORMATION

All employee information, including salary data, evaluations, and personnel file information, is considered confidential and private. Employee information is only to be shared by and with authorized personnel. Employee personnel files are proprietary to TeamHealth. Questions you might have are:

- **Q.** A coworker recently left the organization. I really did not like her and thought she was a poor worker. I recently was called to give a reference on this employee. What should I do?
- A. You should refer the interested party to the TeamHealth Human Resources Department.
- **Q.** I don't think I am being paid fairly. I really would like to know how much my coworkers earn in order to make a comparison. Would it be OK to discuss salary with them?
- **A.** No, your individual salary information is confidential and should only be discussed with your supervisor and/or the Human Resources Department. Sharing salary information is a direct violation of TeamHealth policy.
- **Q.** I attend an annual provider conference, and my colleagues from other affiliated companies attend. I am concerned that my remuneration is inadequate and would like to solicit from them what their contractual remuneration is for comparison. I hear that other professionals do this all the time. Is that acceptable?
- **A.** No. TeamHealth contracts with providers on an individual basis. As a result, conducting your own salary survey would be inappropriate as it would give you access to information that is regarded as confidential in nature.

### INTERACTING WITH SOCIAL MEDIA

All employment relationships involve a duty of faith and fidelity regarding behavior and conduct. Social networking can enable users to publish various types of content that can create potential legal issues. Unless approved by management, employees are prohibited from using social media or electronic networking sites during working hours and from using social media or electronic networking sites outside of working hours to publish, post comments or information, write personal blogs, create forums with unauthorized information about TeamHealth as an organization, its divisions, business units, leadership, Associates, clients, contractors, etc. This includes any breach of proprietary or confidential information; marketing, financial, or compensation information; logos; trademarks; copyrights; client or potential client information; competitors; partners; employees; contractors; etc.

Social networking and social media blogs or postings should be respectful, professional, and courteous. Unauthorized, defamatory, illegal, and/or inappropriate use of the TeamHealth name, logos, copyrights, patents, and proprietary or confidential information is prohibited. Any inappropriate or unprofessional use of social media or electronic networking sites in the work place will be investigated.

### INSIDER INFORMATION AND SECURITIES TRADING

In the course of your affiliation, employment, or contract with TeamHealth, you may become aware of nonpublic information about TeamHealth that may be material to an investor's decision to buy or sell TeamHealth's securities. Nonpublic, material information may include plans for mergers, marketing strategy, financial results, or other business dealings that have not been published in the organization's filings with the Securities and Exchange Commission (SEC). You may not discuss this type of information with anyone outside TeamHealth. Within TeamHealth, you should discuss this information on a strictly "need-to-know" basis and only with other Associates who require this information to perform their jobs.



Securities law and the organization's policy prohibit individuals from trading in the marketable securities of a publicly held organization or influencing others to trade in such securities on the basis of nonpublic, material information. These restrictions are meant to ensure that the general public has complete and timely information on which to base investment decisions.

If you obtain access to nonpublic, material information about the organization while performing your job, you may not use that information to buy, sell, or retain securities of TeamHealth or any other company. Even if you do not buy or sell securities based on what you know, discussing the information with others, such as family members, friends, vendors, suppliers, and other outside acquaintances, is prohibited until the information is considered to be public. Please refer to the organization's Securities Trading Policy for additional guidance.

### MARKETING INFORMATION

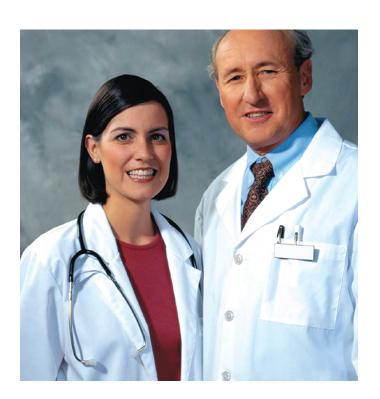
Information regarding marketing and/or customer relations is to be treated as confidential information. TeamHealth operates in a highly competitive environment. Release of valuable information regarding marketing strategies could be disastrous to our organization. Therefore, Associates are not to share information regarding clients, potential clients, marketing strategies, etc., with anyone outside TeamHealth or with anyone who is not authorized to know the information. Questions you might have are:

Q. A competitor called me today and asked me if we were going to bid on a certain contract. What should I do?

A. You are not to share any information regarding potential contracts or strategies with anyone who is not authorized to know this information. If you have questions regarding this matter, please consult with your supervisor.

Q. A member of the press called today to get a statement from me regarding TeamHealth's marketing strategy and business plans. How should I handle this?

**A.** All inquiries made by the press should be directed to TeamHealth's Vice President of Communications. TeamHealth employees are not to make statements and represent TeamHealth's interests to the media absent prior approval from the Vice President of Communications.





### Financial and Professional Records

TeamHealth strives to maintain honest and accurate records. It is an employee's responsibility to ensure that all financial records reflect ethical and accurate transactions. The organization's financial records must conform to generally accepted accounting principles and the Sarbanes-Oxley Act. As such, they may not contain false or misleading information. Medical and business documents and records are to be created, stored, retained, and destroyed in accordance with all applicable laws and the organization's Records Retention Policy.

### BILLING INFORMATION

Bills generated on behalf of affiliated providers should reflect accurate billing for services rendered. Bills are based on accurate coding and on documentation to comply with regulatory requirements that govern reimbursement activities. TeamHealth is dedicated to quality, ethical billing practices and does not condone or participate in fraudulent activities. The rates that are charged by TeamHealth-affiliated providers are based on marketplace criteria generally accepted by all professional, legal, and regulatory entities. Questions you might have are:

- Q. I accidentally charged a patient's bill to the wrong insurance. I am afraid that if I tell my supervisor, I will get fired. What should I do?
- A. You must rectify the problem by speaking with your supervisor immediately. TeamHealth makes every effort to comply with all federal and state laws regarding patient billing.
- Q. I work for the billing company and am behind in my data entry. I thought that I could just discard the charts I have now, and no one would have to know. That would get me caught up immediately. What should I do?
- A. You should go to your supervisor with your dilemma. Discarding patient records puts you and TeamHealth in jeopardy with federal and state agencies regarding records retention and laws regarding patient inducements. It also creates a problem for current and future patient care. It is critical that each patient record be treated with the utmost care and diligence.

### **IDENTITY THEFT PREVENTION**

TeamHealth Associates who deal with patient accounts and payment information are responsible for assisting in the prevention of identity theft. It is our expectation that they will, during the course of their day to day activities, (i) be aware of relevant patterns, practices, and specific forms of activity that are red flags signaling possible identity theft; (ii) detect these identity theft red flags; and (iii) respond appropriately to prevent and mitigate identity theft.

- Q. A patient in one of TeamHealth's clinics presents with suspicious documents (e.g., suspected forgeries or a mismatched photo description) to a registration and payment clerk at the time of registration and/ or payment. What should the clerk do?
- A. Once potentially fraudulent activity is detected or suspected, the clerk should discreetly notify his/ her supervisor to obtain additional authentication to determine whether the attempted patient account is fraudulent or authentic. If fraud is determined to be the case, he/she should notify the Compliance Department and proper authorities.



### CODING PRACTICES

All patient records will be coded based on the documentation included by the provider in the medical record. We prohibit any Associate or agent of TeamHealth from knowingly presenting or causing to be presented claims for payment or approval that are fake, fictitious, or fraudulent.

TeamHealth has stringent coding procedures that must be followed. These procedures apply to both the medical record coders and the providers delivering and documenting patient care. We operate oversight systems designed to verify that claims are submitted only for the services rendered and that services are coded and billed as provided. These systems emphasize the critical nature of complete and accurate documentation of services provided. As part of our documentation effort, we will maintain current and accurate billing records. Questions you might have are:

- Q. I am a medical records coder. I was coding the chart of a Medicare patient in which the physician noted the patient had been admitted, but there was no accompanying documentation to support the diagnosis or treatment. My supervisor wants me to assign a level 5 anyway. What should I do?
- A. You must have the appropriate documentation to merit the coding level. It would be our expectation that you consult with your supervisor's supervisor, Human Resources, and/or report this matter to the Compliance Department or the Compliance Hotline.

### **EXPENSE REPORTS**

Expense reports are to be submitted for company-related expenses only. The original receipt must accompany the expense report for each expense incurred. All expense reports must comply with TeamHealth's policies and procedures. See TeamHealth's Expense Reimbursement Policy for more information.

Questions you might have are:

- Q. I have been traveling extensively as a part of my job. I have been very busy and have lost my receipt. While I have been attentive to these details in the past, I am concerned about my dilemma. What should I do?
- **A.** You must have a receipt for any amounts stipulated by company expense policy. Contact the vendor to see if they will issue a new one or if they retained a copy that could be used as an original.

### FINANCIAL STATEMENTS

TeamHealth requires the use of generally accepted accounting principles. We state our financial information in a straightforward and honest manner. Financial records should not be kept in a manner that would appear false or misleading to others. All financial information must reflect actual transactions and conform to generally accepted accounting principles, as well as the Sarbanes-Oxley Act as it pertains to publicly traded companies. No undisclosed or secret funds or accounts may be established by any TeamHealth Associate. TeamHealth maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.

- Q. I have worked on the financial statements all week and still cannot get them to balance. I know that I could "massage the numbers" and my supervisor would never know the difference. Is that OK?
- A. It is never OK to "massage the numbers." You must perform your duties in an honest and ethical manner.







### FINANCIAL/INVESTOR INFORMATION

TeamHealth Associates are expected to keep all financial and investor information confidential. Financial reports are the property of TeamHealth. The distribution of financial reports to anyone other than TeamHealth's inside advisors (auditors, tax advisors, bankers, legal counsel, insurance advisors, etc.) should be restricted to the Executive Officer level on a need-to-know basis. Requests for information by potential or actual investors in TeamHealth should be directed to the organization's Office of Investor Relations. Only authorized spokespersons are permitted to speak on behalf of the organization to the organization's shareholders or to securities market professionals like brokers, dealers, investment advisors, certain institutional investment managers, and investment companies. For more information on this, please see the organization's Policy on Authorized Communications. Revealing non-public, material information about the organization (insider information) to influence trading in the organization's shares is illegal; please refer to the organization's Securities Trading Policy for additional guidance and information.

Questions you might have are:

- Q. An investment firm keeps calling me asking questions about our financial status. What do I do?
- A. Refer the firm to TeamHealth's Office of Investor Relations. Do not release confidential information.

### PATIENT RECORDS

Patient records are to be maintained in a manner that complies with all applicable laws and that is honest and ethical. Patient records are not to be falsified or otherwise tampered with or altered.

- Q. I am responsible for patient records in my area. I am way behind in my filing. I am supposed to date stamp when the information went into the file. However, I am so far behind I am afraid I will get in trouble if I use the correct date. Can I fudge the dates just a little so no one will notice?
- A. No, patient records are to be true and accurate. It is a violation of TeamHealth's policy to enter information into a patient record that is not true.



### **Conflicts of Interest and Business Courtesies**

TeamHealth Associates are to conduct themselves personally and professionally in a manner that would avoid conflicts of interest. Before engaging in any conduct that may result in a conflict of interest, you should consult your supervisor or TeamHealth's Conflict of Interest Policy, found on the TeamNet website under Compliance Program.

In addition, Associates, officers, and directors owe a duty to TeamHealth to advance the organization's business interests when the opportunity to do so arises. Associates, officers, and directors are prohibited from personally taking (or directing a third party to take) a business opportunity that is discovered through the use of company property, information, or position. More generally, Associates, officers, and directors are prohibited from using TeamHealth property, information, or position for personal gain and from competing with the organization. Associates, officers, and directors also owe a duty of loyalty to notify the organization if: (i) they become aware of any actual or perceived threats against the organization's business interests in its relationships with clients or (ii) if they are contacted by a competitor of the organization about disclosing confidential information about the organization or soliciting the organization's clients.

### **VENDOR RELATIONS**

Contracts with vendors should be awarded on the basis of merit following sound business practices. Awards of contracts should be made without any conflict of interest on the part of the company Associate that has not been fully disclosed to the Associate's supervisor.

**Q.** My sister has her own cleaning service. I want to give her our office cleaning contract. This would help my office and my sister. Is that OK?

**A.** Contracts should be awarded based on merit after clearance through an OIG/GSA database check. The organization has established an approved vendor list that must be utilized where appropriate. If after reviewing the organization-approved vendor list, your sister is the best choice (considering price, product availability, fair consideration of others, OIG/GSA eligibility, etc.), then contact your supervisor about the appropriateness of using your sister's supply business. However, you should disclose the relationship to your supervisor and the Chief Compliance Officer in accordance with TeamHealth's Conflict of Interest Policy.

### **OUTSIDE ACTIVITIES**

Occasionally, employees may feel the need to perform outside work to earn extra money. Any outside work or other activity that interferes with an employee's duties with the organization or that reflects negatively on the organization is prohibited. An employee must consult with his/her supervisor in advance to determine whether any outside work or activity conflicts with employment responsibilities.

**Q.** I work in a clinic as a medical assistant. Things are really tight now, and I need extra money. It is OK to moonlight?

**A.** You must first check with your supervisor to ensure there is no conflict of interest. Moonlighting may be approved if it is not done for a competitor or in a way that would be perceived as a conflict of interest.







Q. I am a vice president in the organization's corporate office and have been chosen to appear on a reality dating show. Since I am single, this would be a good opportunity for me to meet some new people. I would like to take 3 weeks of leave time to pursue this opportunity and return to my job when it is complete. Would this be something that my supervisor would approve?

A. Since this activity could reflect negatively on the organization, the organization has the right to decline your request to allow you appear on this show. Please consult with the organization if you plan to engage in any outside activity that could reflect negatively on the organization or its clients.

### GIFTS TO ASSOCIATES AND TO CLIENTS

Associates are expected to conduct personal and professional business to avoid conflicts of interest and are not permitted to participate in any activities that could conflict with their responsibilities at TeamHealth. Associates cannot accept payments or gifts and cannot give them to clients or potential clients, including special favors that might be perceived as putting such person under an obligation to someone who does business with TeamHealth or wants to do business with TeamHealth. The only types of gifts that are appropriate to accept or give are those of small value extended as a business courtesy, such as sales promotional items (pens, mugs, etc.), occasional meals (reasonably priced), or other small tokens. Please consult with the Compliance Office before you accept or offer a gift of any kind from or to a current or potential vendor or client. You should refer to TeamHealth's Charitable Contributions Policy, Conflict of Interest Policy, and Business Courtesy Policy (all found on TeamNet) if you have any questions about these policies or regarding whether a gift is extravagant or excessive. As a general rule, gifts over \$50 are prohibited.

The following guidelines typically apply to gift giving/receiving:

- Associates shall avoid accepting or providing benefits that could be seen as creating conflict between their personal interests and TeamHealth's legitimate business interests. This includes accepting or providing expensive gifts, transportation, or entertainment provided or received in connection with the job.
- Do not accept gifts from a vendor or potential vendor, and do not provide to a client or potential client anything that exceeds \$50 in value unless reported and approved in writing, as documented in the organization's policy. Gifts of nominal value, such as meal and entertainment courtesies are not hereby prohibited, but should be reasonable.
- Gifts and benefits to clinicians or referral sources are not appropriate. However, occasional non-cash gifts that are limited to reasonable meal expenditures or that are of a nominal value are not expressly prohibited per the organization's policies.
- Charitable gifts or contributions made to clients must be approved in advance by the Chief Compliance Officer and General Counsel and also meet the following criteria: (i) they must be made payable to a 501(c)(3) charitable foundation, (ii) they must be made pursuant to broad-based community campaigns, (iii) they may not be made around the time of any contract award or renewal decision, and (iv) they must be relatively modest in comparison to the overall campaign target.



Some questions you might have are:

- Q. I often get offers for lunch by potential vendors. Should I accept?
- **A.** It is permissible to accept small gifts like lunch at a moderately priced restaurant or some other small token as long as that meal or gift does not influence your decision regarding vendor relationships and/or contracts.
- **Q.** A hospital administrator has invited a TeamHealth-affiliated company to participate in a charitable golf tournament sponsored by his hospital's foundation. He says that the entry fee is \$2,500 for a team of four players and that I can write the check directly to him for deposit in the foundation account. Is this acceptable?
- **A.** No. Charitable contributions such as this can never be paid to individuals and must always be paid directly to the 501(c)(3) charitable foundation sponsoring the tournament. If prior approval was obtained from the Chief Compliance Officer and the payment was made to the 501(c)(3) organization and certain other conditions found in our policy were met, then this contribution may be acceptable.

### U.S. FOREIGN CORRUPT PRACTICES ACT

The United States Foreign Corrupt Practices Act (FCPA) requires us to exercise care in our dealings with foreign government officials, employees, or representatives and members of their families. The FCPA prohibits providing anything of value to any of these individuals for the purpose of obtaining or retaining business. Under the FCPA, TeamHealth is responsible for the actions of its agents and representatives. Before offering anything of value to foreign government officials, employees, or representatives or a member of their families, a TeamHealth Associate must obtain approval from the Compliance or Legal Departments.

### **Company Property**

TeamHealth property should be treated with respect and handled in the appropriate manner as it relates to our business. TeamHealth property should be used for legitimate business purposes and not be misused at any time. TeamHealth property is defined to include medical equipment, office equipment, computer equipment, real estate, supplies, customer lists, contracts, reports, files, e-mails, voice mails, computer software (including purchased software and source codes for company-owned software), computer time, data stored in any form, copyrights, trademarks and service marks, intellectual property, facilities, and company-provided services. Associates should have no expectation of privacy while using company property.

Each TeamHealth Associate should: (1) not make personal use of or otherwise improperly use TeamHealth property, (2) obtain approval by the appropriate management authority prior to the commitment or expenditure of TeamHealth funds, (3) follow established internal control procedures in handling and recording all TeamHealth funds and property, and (4) report any observed misuse of TeamHealth property to management.



### **COMPANY ASSETS**

TeamHealth assets should be preserved and treated in a manner that is appropriate and ethical. Property should not be treated in a manner that would cause undue maintenance or repair. This includes all property, whether owned or leased. Questions you might have:

**Q.** My supervisor has her own business on the side. I see that she spends company time, computer output, and printers to support her business. What should I do?

**A.** If you are comfortable doing so, speak with her about TeamHealth's policies and Code of Conduct. She may have discussed this with her supervisor's supervisor or Human Resources and received their approval. If you are uncomfortable speaking with her, there are several options that you may take, including talking to her supervisor, Human Resources, the Compliance Officer, or reporting this to the Hotline.

### INTELLECTUAL PROPERTY

TeamHealth Associates may only use logos, trademarks, service marks, brand names, copyrighted materials, and other intellectual property owned by the organization in accordance with the organization's policies on such use. Associates may not use TeamHealth logos, trademarks, service marks, brand names, copyrighted materials, or other intellectual property owned by the organization for any personal use.

**Q.** I am working on a software project that includes developing new software for TeamHealth. Can I take this product and market it?

**A.** No. The product you are developing is proprietary to TeamHealth and cannot be used for personal gain. You cannot market the product or source codes you are developing for the company.

**Q.** I am a TeamHealth Associate who works as a physician and would like to order lab coats, scrubs, and a briefcase containing the TeamHealth logo. I have a copy of the logo on my computer and would like to send it to the company from which I am ordering these items to place on them. Is this acceptable?

**A.** No. Any use of TeamHealth logos and related items must be approved in advance by either the Vice President of Communications or the Legal Department.





### **Community Relations**

TeamHealth recognizes that as a hospital-based physician staffing and administrative services company, it is important to have a positive impact in the communities where our clients are located. TeamHealth is dedicated to enhancing the quality of the communities the organization serves. This enhancement is evidenced through:

- Handling of biohazardous materials in an appropriate manner
- Serving the community as a responsible employer
- Taking part in community events that are healthcare oriented
- · Networking with other healthcare professionals to improve the quality of healthcare in the area

Questions you might have are:

**Q.** I am a provider for TeamHealth and have been called by the local community college to speak on my profession in healthcare. Should I do this?

**A.** If your schedule permits, this would be an excellent opportunity for you to make a contribution to the community. Please check with your local medical director and the Vice President of Communications to ensure this engagement would not adversely impact the organization.

### **POLITICAL ACTIVITIES**

TeamHealth encourages Associates, officers, and directors to contribute to the community and to fully participate in local, national, and international politics. In doing so, however, TeamHealth and its Associates must follow the laws governing participation in political affairs, including political contributions and lobbying.

No employee may lobby or try to influence the actions of government officials regarding legislation or other policy decisions on matters relating to TeamHealth business unless the action is approved by the General Counsel at TeamHealth's corporate office. It is important to coordinate our lobbying efforts, and often those considered to be lobbyists must register as lobbyists.

It is also TeamHealth's policy to comply with all laws governing political contributions. As a matter of policy and in compliance with applicable law, the organization does not make corporate political contributions to candidates in any country or region, even where allowed by law. Associates are free to give to a party or to a candidate on their own behalf using their personal funds, but they may not make any contribution of TeamHealth's funds, property, or services to any political party or committee or to any candidate for or holder of any office of any government. Political contributions are not reimbursable to Associates as business expenses by the organization (see TeamHealth's Political Contributions Policy).



## **Code of Conduct Acknowledgement**

BY MY SIGNATURE BELOW, I CERTIFY THAT:

- I have received and have read TeamHealth's Code of Conduct.
- I agree to comply fully with the standards, policies, procedures, and other provisions of TeamHealth's Code of Conduct.
- I understand the provisions of TeamHealth's Code of Conduct are mandatory, as is compliance with the standards, policies, procedures, and other provisions contained in and referred to in TeamHealth's Code of Conduct.
- I also understand that TeamHealth reserves the right to occasionally amend, modify, and update TeamHealth's Code of Conduct and the provisions and policies described in TeamHealth's Code of Conduct.
- I also acknowledge that TeamHealth's Code of Conduct is only a statement of principles for individual and business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment.
- I acknowledge that any violation of TeamHealth's Code of Conduct or of policies it references may subject me to adverse actions. If you are an employee, please consult the Employee Handbook for further information.

Signature	
Position	
Printed Name	
	D.J.
Last Four Digits of Social Security Number	Date
Facility	

Upon completion, send to:

TeamHealth Human Resources Department 265 Brookview Centre Way, Ste 400 Knoxville, TN 37919

This card with

# TeamHealth's Ethics and Compliance HotLine Number

may be detached and kept in Associate's wallet or purse.

TEAMHealth.

Ethics and Compliance HotLine

215 2242

888.315.2362

f 865.293.5494

www.mycompliancereport.com or Compliance Hotline on TeamNet





Suite 400







