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**TEAM**Health®

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# Letter from our Leadership

TeamHealth is the leading physician practice in the U.S., driven by an unwavering commitment to quality and safety and supported by a world-class operating team. We are committed to conducting 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.

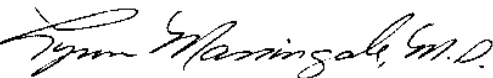
Integrity is vital to all we do. At TeamHealth, we attempt to uphold the highest ethical standards. In your relationship with TeamHealth, you will not be asked to do anything that is illegal or unethical. We are glad to support anyone who is doing the right thing regarding medical practice and business.

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 clinician practicing medicine, a coder assigning CPT 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 service line leader or

the Compliance Department. You may also call our toll-free Compliance Hotline at 888.315.2362. You have our personal assurance there will be no retaliation 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 company 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,  
Co-Founder and Chairman



Leif Murphy,  
President and Chief Executive Officer

*Unless the context requires otherwise, references to “TeamHealth,” “we,” “our,” “us” and the “Company” or “Organization” refer to Team Health Holdings, Inc., its subsidiaries and its affiliates, including its affiliated medical groups, all of which are part of the TeamHealth organization. Separate subsidiaries or other affiliates of Team Health Holdings, Inc. carry out all operations and employ all employees within the TeamHealth organization. The terms “clinical providers,” “TeamHealth physicians or providers,” “affiliated providers,” “our providers” or “our clinicians” and similar terms mean and include: (i) physicians and other healthcare providers who are employed by subsidiaries or other affiliated entities of Team Health Holdings, Inc., and (ii) physicians and other healthcare providers who contract with subsidiaries or other affiliated entities of Team Health Holdings, Inc. All such physicians and other healthcare providers exercise their independent professional clinical judgment when providing clinical patient care. Team Health Holdings, Inc. does not contract with physicians to provide medical services nor does it practice medicine in any way.*

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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. Circumstances and situations that are not specifically covered in the Code of Conduct may arise. 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.

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).

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# Compliance Program Structure

TeamHealth Associates are committed to conducting all business activities in conformance with the highest ethical standards and in compliance with the federal anti-kickback statute, the Stark Law, the False Claims Act, the Health Insurance Portability and Accountability Act (HIPAA), the Deficit Reduction Act and other applicable federal, state and local laws, rules and regulations governing the healthcare industry. To reinforce this commitment, TeamHealth has established a comprehensive compliance program. An overview of this program is accessible on the TeamHealth website and Zenith. The program has the following goals:

- 1. Prevent, detect and correct accidental and intentional instances of fraud, waste and abuse within TeamHealth;***
- 2. Heighten awareness of compliance and ethical issues;***
- 3. Provide Associates with avenues for addressing compliance and ethical issues; and***
- 4. 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 an 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 activities with respect to issues of regulatory compliance and ethics to ensure that high standards of business, medical, legal and personal ethics are met within the organization.

The Executive Compliance Committee is a committee consisting of TeamHealth executives from various functions that provide oversight, support and guidance with respect to the design, implementation and effectiveness of the compliance program. 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 and 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 or a member of the Board may be made only by the Board.



## 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 Compliance Hotline and that they have an obligation to report any suspected violation of the Code of Conduct to TeamHealth’s Compliance Department, and (4) they agree to adhere to the principles and objectives of the corporate Compliance Program and related policies found on Zenith.

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

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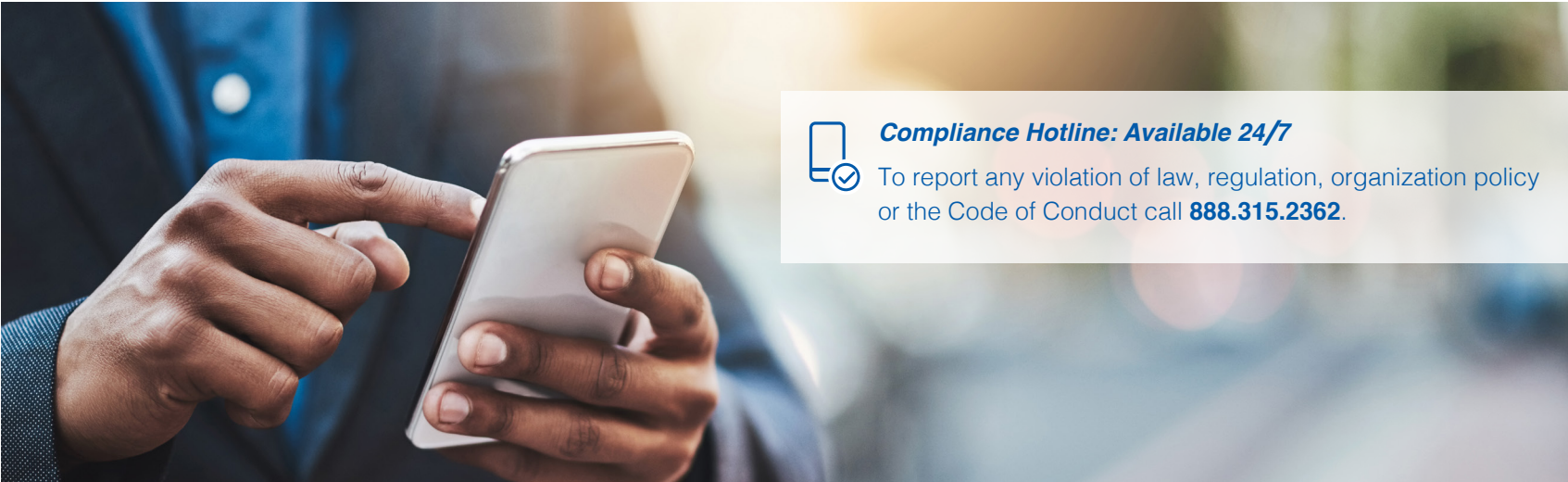
# Resources for Guidance and Reporting Violations

TeamHealth 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, clinician, subcontractor or vendor that appears to violate applicable laws, rules, regulations, this Code of Conduct, or any TeamHealth policies.

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 Human Resources, the Compliance Department, or the Compliance Hotline.

TeamHealth has no tolerance for any person or persons who retaliate against those who make inquiries or report matters of concern regarding compliance matters. Retaliation or retribution against any 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 Human Resources, the Compliance Department or the Compliance Hotline do not protect callers from receiving appropriate disciplinary action regarding their own performance or conduct.

The Chief Compliance Officer or designee will thoroughly review, evaluate and respond to allegations of wrongdoing, reported concerns and/or inquiries made directly to the Compliance Department or to the Compliance Hotline in an impartial manner. All allegations will be thoroughly investigated and verified before any action is taken. For more information, refer to the TeamHealth Disclosure Program Policies.



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# Hotline

The Compliance Hotline is one resource available for reporting questionable activities, including but not limited to, violation of TeamHealth policies, non-compliance with applicable legal requirements and retaliation against Associates who in good faith report compliance or legal concerns. The Compliance Hotline is available 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 Compliance Hotline will not be traced or recorded, and inquiries may remain anonymous. If callers choose to identify themselves, their confidentiality will be protected to the fullest extent possible. Reports to the Hotline should be factual rather than speculative or conclusory and should contain as much specific information as possible to allow for proper assessment. Ideally, 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.



*The **TeamHealth Compliance Hotline** can be accessed as follows:*

**Phone: 888.315.2362**

**Online: [teamhealthcompliance.com](https://teamhealthcompliance.com)**

**TeamHealth.com: “Compliance Hotline” link**

**Zenith: Compliance and Ethics Channel, “Compliance Hotline” link**

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 or website described above or by writing to:



**CONFIDENTIAL**

**Attention: General Counsel TeamHealth**

**265 Brookview Centre Way, Ste. 400**

**Knoxville, TN 37919**

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# Professional Conduct/Fair Dealing

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.

In addition, Associates owe a duty to TeamHealth to advance the organization's business interests when the opportunity to do so arises. Associates 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 are prohibited from using TeamHealth property, information or position for personal gain and from competing with the organization. Associates also owe a duty of loyalty to notify TeamHealth 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.

It is understood that Associates of TeamHealth will exhibit cooperative, constructive, courteous and 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; and*
- *Refrain from behavior or expression, both in and outside the workplace, that threatens to adversely affect our workplace environment, our company as a whole, any of our customers or any of our patients or their visitors, such as hateful expression or intimidation and harassment of others based on characteristics that are protected by law.*



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# Professional Conduct/Fair Dealing *continued*

## FAIR BUSINESS RELATIONSHIPS

TeamHealth values the relationships it has developed with its Associates and facility 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 clinician, I treat patients at all levels of acuity. However, I have a colleague who wants to only treat the more challenging cases (high trauma, high acuity, etc.). How should I handle this?**

**A. At TeamHealth, we expect all affiliated clinicians 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.

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 Associate that has not been fully disclosed to the Associate's supervisor. Some questions you might have are:

**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 Office of Inspector General/General Services Administration (OIG/GSA) database check. TeamHealth has established an approved vendor list that must be utilized where appropriate. If after reviewing the 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 business. However, you should disclose the relationship in accordance with TeamHealth's Conflict of Interest Policy.**

**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 OIG/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 anesthesiology business unit is purchasing new equipment. As the anesthesiologist 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 an anesthesiologist, 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.**

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# Professional Conduct/Fair Dealing *continued*

## 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 reasonably priced meals or other small tokens. You should refer to the TeamHealth Charitable Contributions Policy, Conflict of Interest Policy and Gifts to and from Business Partners Policy on Zenith before you exchange a gift of any kind with a current or potential vendor or client. Please contact the Compliance Department if you have questions about these policies or regarding whether a gift is extravagant or excessive.

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 approval was obtained in accordance with the Charitable Contributions Policy and other conditions found in the policy were met, then this contribution may be acceptable.*



### Gift giving/receiving guidelines:

- Associates shall not give or accept gifts that exceed \$50 in value from a vendor or potential vendor or a client or potential client unless the gift has been reported and approved in writing, as documented in the TeamHealth 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 TeamHealth's policies.
- Charitable gifts or contributions made to clients must comply with the Charitable Contributions Policy.



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# Professional Conduct/Fair Dealing *continued*

## 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 TeamHealth or that reflects negatively on TeamHealth is prohibited. An employee must consult with his/her supervisor in advance to determine whether any outside work or activity conflicts with employment responsibilities. In addition, a Conflict of Interest Disclosure Form may need to be completed any time that a potential conflict of interest arises. The Conflict of Interest Policy and Disclosure Form can be found on the Compliance Channel in Zenith.

Some questions you might have are:

**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 TeamHealth'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 three 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 TeamHealth, the organization has the right to decline your request to allow you to appear on this show. Please consult with your supervisor, the Human Resources Department and the Strategic Resources Group if you plan to engage in any outside activity that could reflect negatively on TeamHealth or its clients.*



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# Government Inquiries

It is TeamHealth's policy to cooperate fully with all government inquiries. TeamHealth Associates should immediately contact their supervisor, the Compliance Department and General Counsel at TeamHealth's National Support Center 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; or***
- 3. Attempt to persuade another TeamHealth Associate 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 TeamHealth. 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 Human Resources Department immediately. He/she will ensure that the appropriate area handles the inquiry.**



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# Patient Care

Our organization is dedicated to delivering quality patient care. Clinicians 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 that is unique to its profession. The following policies are meant to supplement, not replace, that code for Associates.

## PATIENT CONFIDENTIALITY/ PROTECTED HEALTH INFORMATION

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 with HIPAA regarding protected health information (PHI). 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.

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

Breaches of a patient's confidentiality may place TeamHealth in a position of liability, cause TeamHealth to lose valuable client

relationships or 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 entire ER 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. If you need further guidance, please contact your supervisor or the Compliance Department.**
- 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 Compliance Department or the Compliance Hotline.**
- 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.**
- 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.**

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## QUALITY OF CARE

Patients should receive quality care regardless of the financial circumstances. TeamHealth-affiliated clinicians follow the Emergency Medical Treatment and 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. If the clinician 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 clinicians complain about certain payer types of patients. These clinicians purposely spend less time with the patients who are economically disadvantaged. What should I do?**
- A. Clinicians affiliated with TeamHealth should provide the same level of quality patient care to all patients regardless of ability to pay. You should contact the Facility Medical Director, the Compliance Department or the Compliance Hotline.*
- Q. As a clinician, 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 your Facility Medical Director. He/she can give you guidance on how to resolve this issue.*



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# 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, customers, patients, and vendors. TeamHealth will not tolerate any form of discrimination on the basis of race, creed, religion, gender, age, disability, national origin or other basis. TeamHealth is dedicated to providing Associates with an environment free of harassment and/or discrimination and will not tolerate any behavior that can be construed as harassing or contributing to a hostile work environment.

## HARASSMENT-FREE WORKPLACE

Each TeamHealth Associate has the right to work in an environment free of harassment. 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 a TeamHealth 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 Compliance 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, Human Resources or the Compliance Department. You may also contact the Compliance Hotline with your concern.*

**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 does not work, speak with your supervisor, your supervisor's supervisor, the Human Resources Department or the Compliance Department. You may also contact the Compliance 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. 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 your supervisor's supervisor, Human Resources or the Compliance Department. You may also contact the Compliance Hotline with your concern.*



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# Treatment of Associates *continued*

## 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 been 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 Human Resources.**

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

**A. Explain to the manager that TeamHealth recruits new Associates 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 Compliance Hotline.**

## DRUG AND ALCOHOL ABUSE

TeamHealth is committed to an alcohol-free and drug-free workplace to protect the interests of its Associates, partners and patients. 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; and**
- **Follow-up to a substance abuse treatment program.**

Questions you might have are:

**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 alcohol-free and drug-free while at work. We may use drug testing as a means of enforcing this policy.**

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## 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 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 carries a loaded revolver at all times. Is this appropriate?**

**A. No. TeamHealth has a policy prohibiting Associates from carrying firearms or weapons on company or client property. You should report this to your supervisor or Human Resources.**

**Q. The hospital where I provide services requires all clinicians to submit to “universal precautions.” However, I have seen a fellow clinician violate “universal precautions” by not wearing protective gear. This is not only a potential threat to his health, but also to the health of the patient. How should this be handled?**

*A. This matter should be reported to your Facility Medical Director.*

## LICENSE AND CERTIFICATION RENEWALS

Associates 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.



### Important Note

TeamHealth will not allow any licensed Associate to work without all required, valid and current licenses.

## INELIGIBLE PERSONS

TeamHealth 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, or has not been reinstated in a federal/state healthcare program after a period of exclusion, suspension, debarment or ineligibility. TeamHealth 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.

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# Treatment of Confidential Information

TeamHealth understands the critical nature of confidential information. The list to the right, 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.

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 Strategic Resources Group. If you have questions regarding the dissemination of information, please speak with your supervisor. Disseminating confidential information without proper authorization and approval will result in disciplinary action up to and including termination.

## ASSOCIATE INFORMATION

All information about other associates, including information about their compensation, evaluations and personnel file information is considered confidential and private. Information about other associates should be shared only with authorized personnel. Personal information about associates, including information and documents in their personnel files, is proprietary to TeamHealth.

A question you might have is:

- Q. A coworker recently left TeamHealth. 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.**

## 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, Associates 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 or 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 is prohibited in the workplace.

TeamHealth reserves the right to take disciplinary action in response to any behavior or expression that occurs outside the workplace involving hateful expression, intimidation or harassment of others based on characteristics that are protected under applicable law that we believe threatens to adversely affect our workplace environment, our company as a whole, any of our customers or any of our patients or their visitors.



### Strictly Confidential Examples

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

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## 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.

## 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 detrimental 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 the Strategic Resources Group. TeamHealth Associates are not to make statements and represent TeamHealth's interests to the media without prior approval from the Strategic Resources Group.**



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# 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.

## CODING PRACTICES

All patient records will be coded based on the documentation generated by the clinician 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 rigorous coding procedures that must be followed. These procedures apply to both the medical record coders and the clinicians delivering and documenting patient care. We operate oversight systems designed to verify that claims are submitted only for the medically necessary 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. A question you might have is:

**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 or report this matter to Human Resources or the Compliance Department.**

## BILLING INFORMATION

Bills generated on behalf of affiliated clinicians 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 clinicians 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.**



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## 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 signal possible identity theft; (ii) detect these identity theft signals; and (iii) respond appropriately to prevent and mitigate identity theft.

A question you might have is:

**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.*

## 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 Business Travel and Expense Reimbursement Policy for more information.

A question you might have is:

**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 TeamHealth 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. 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.

A question you might have is:

**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.*

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## 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 Chief Financial Officer. 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.

A question you might have is:

**Q. An investment firm keeps calling me asking questions about our financial status. What do I do?**

**A. Refer the firm to TeamHealth's Chief Financial Officer. Do not release confidential information.**



### 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, representatives or a member of their families, a TeamHealth Associate must obtain approval from the Compliance or Legal departments.

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# Community Relations

TeamHealth recognizes that as a leading clinician services organization, it is important to have a positive impact in the communities we serve. TeamHealth is dedicated to enhancing communities 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; and*
- *Networking with other healthcare professionals to improve the quality of healthcare in the area.*

A question you may ask is:

**Q.** I am a clinician 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 Strategic Resources Group to ensure this engagement would not adversely impact TeamHealth.

## 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 National Support Center. 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, TeamHealth 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 TeamHealth.



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