

TEAMHealth[®]

Code of Conduct



TEAMHealth[®]

A letter from our Leadership

Dear Colleague,

Welcome to TeamHealth where we are dedicated to upholding the highest ethical standards in everything we do. In an effort to adhere to all laws, government regulations, third-party payor agreements, and our own policies and procedures, we maintain a comprehensive Compliance and Ethics Program. The program supports our mission, vision, and values and, consequently, it is incorporated into our daily activities as we interact with patients and families, clients, vendors, and each other.

This Code of Conduct is an essential component of our Compliance and Ethics Program. It emphasizes the values that we share at TeamHealth and provides guidance to ensure that our work is done in an ethical and legal manner. The Code of Conduct provides a framework to follow if you encounter a situation or are considering a course of action that feels questionable. It also includes resources to help resolve many ethical dilemmas that you might encounter. Please review the Code of Conduct thoroughly and adhere to its spirit as well as its specific provisions.

If you have questions regarding the topics covered in the TeamHealth Code of Conduct, consult your leader or contact the TeamHealth Compliance Department. 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 in good faith possible improper conduct.

The ethics and integrity of TeamHealth are reflected in our mission and values and our Code of Conduct. 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, MD, FACEP

Co-Founder and Chairman

Leif Murphy

Chief Executive Officer

"TeamHealth" is the brand name for our family of companies. For purposes of this Code of Conduct and its related policies, and unless the context requires otherwise, references to "TeamHealth," "we," "our," "us" and the "Company" or "Organization" refer to our family of companies, which consists of Team Health Holdings, Inc., its subsidiaries and its affiliates, including its affiliated medical groups. 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."

Our Mission

We deliver exceptional care during life's pivotal moments.



Our Vision

To positively impact the quality of life for every person we encounter.



Our Values



We advance exceptional clinical quality care and uncompromised patient safety.



We center on trust, well-being, and respect.



We forge partnerships with our clients that support our communities and enhance the lives of our patients.



We support our decisions with comprehensive, evidence-based measures.



We prioritize stability, longevity, and innovation to foster growth.

TABLE OF CONTENTS

The Purpose of the Code of Conduct	5
Responsibilities	5
Acknowledgment Process	6
Our Commitment to Patient Care	7
Quality of Care	7
Patient Confidentiality	7
Patient Diversity and Non-discrimination	7
Conducting TeamHealth Business	8
Confidential Information	8
Securities and Insider Information	8
Accuracy, Retention, and Disposal of Records	8
Coding, Billing, and Reimbursement	9
Physician Relationships	9
Loyalty and Conflicts of Interest	10
Relationships with Vendors, Suppliers, and Subcontractors	10
Outside/Dual Employment	11
Gifts, Entertainment, and Business Courtesies	11
Political Activities and Contributions	11
Workplace Conduct and Practices	12
General	12
Equal Opportunity Employment and Business Relationships	12
Employment/Screening	12
Harassment/Workplace Violence	13
Substance Abuse/Impairment	14
Environmental Health and Safety	14
Responsible Use of Social Media	14
Legal and Regulatory Compliance	15
Deficit Reduction Act of 2005	15
Government Inquiries and Investigations	15
TeamHealth Assets	15
The TeamHealth Compliance and Ethics Program	16
Program Structure	16
Reporting Compliance Concerns	17
Obligation to Report	17
What to Report	17
How to Report	17
Non-Retaliation Policy	18
Corrective Action	18
Additional Resources	18
Code of Conduct Acknowledgment	19

The Purpose of the Code of Conduct



The TeamHealth Code of Conduct is a fundamental part of our organizational Compliance and Ethics Program. The standards set forth in the Code of Conduct apply to all TeamHealth directors, officers, employees, and independent contractors, including but not limited to physicians, advanced practice clinicians, nurses, and other clinical and non-clinical persons (referenced individually as an “associate” and collectively as “associates”).

The Code of Conduct 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. Associates may encounter situations that are not specifically covered in the Code of Conduct. If you encounter such a situation, 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 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. It does not create any rights, contract or guarantee of employment, benefits, or working conditions between any associate and TeamHealth.

Responsibilities



While all associates are obligated to follow our Code of Conduct, we expect our organizational leaders to lead by example. Associates with supervisory responsibility are expected to exercise that responsibility in a manner that is kind, sensitive, thoughtful, and respectful. Each leader is expected to create an environment where all associates are encouraged to raise concerns and propose ideas.

Leaders are also expected to ensure that those on their team have sufficient information to comply with applicable laws, rules, regulations, and policies, and resolve ethical dilemmas. They must help to create a culture that promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Acknowledgment Process



As a TeamHealth associate, you are required to:

1. Read the Code of Conduct and associated TeamHealth policies and seek to understand how they apply to your role.
2. Be familiar with, understand, and observe the legal and regulatory requirements applicable to your role.
3. Report possible or actual violations of law, rule, regulation, TeamHealth policy or this Code of Conduct.
4. Respect the values and beliefs of our patients, their family members, and other associates.
5. Prevent and refrain from discrimination and harassment of any kind.
6. Refrain from conflicts of interest and using your position for personal gain.
7. Exhibit the highest ethical standards when acting on behalf of TeamHealth.

Adherence to the Code of Conduct and participation in Compliance and Ethics Program activities will be considered in employment and contractual decisions for all associates.



Our Commitment to Patient Care



Quality of Care

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

TeamHealth is dedicated to delivering exceptional care to all patients. To that end, we are committed to providing care with compassion, respect, and empathy, and ensuring that decisions are made in the best interests of the patient. We treat all patients with courtesy, respect, and understanding, recognizing their autonomy and individual rights. We respect the rights of patients to be involved in all aspects of their care and obtain informed consent for treatment. We maintain thorough and complete records of patient information. This commitment to quality of care is an obligation of every associate.

Patient Confidentiality

TeamHealth is committed to complying with all applicable privacy and security laws and regulations, including the Health Insurance Portability and Accountability Act (“HIPAA”). Patients have a right to expect that their privacy will be protected, and patient-specific information will be released only to persons involved in their care, as authorized by law, or by the patient’s written authorization.

At TeamHealth, we all play a role in protecting the confidentiality of patient information.

To that end, the following guidelines apply:

- Only access patient information that is necessary to perform your job duties.
- Do not take Protected Health Information (PHI) home or transport PHI without prior approval from management.
- Safeguard all communications, including faxes, emails, and conversations on the telephone or in public areas.
- Maintain the confidentiality of computer passwords and access codes.
- Immediately report any breaches of patient confidentiality to the Compliance Department.
- For additional information, review the TeamHealth Privacy Policies.

Patient Diversity and Non-discrimination

TeamHealth is continually striving to incorporate multicultural and diversity awareness into our patient care so that every patient has the best experience possible. We comply with applicable state and federal civil rights laws and do not discriminate based on race, color, national origin, citizenship, sex, sexual orientation, gender identity, pregnancy, religion, age, disability, armed forces status, genetic information, or any other classification protected by federal, state, or local law.

Conducting TeamHealth Business



Confidential Information

The term “Confidential Information” includes virtually all information related to TeamHealth operations that is not publicly available. Examples of Confidential Information include, but are not limited to, personnel data, patient clinical information and billing data, TeamHealth financial data, strategic plans, and marketing strategies, supplier and subcontractor information, and proprietary computer software.

All associates are required to take reasonable precautions to protect Confidential Information. Only access Confidential Information when necessary for a legitimate business purpose. Do not make inappropriate modifications to Confidential Information. Do not destroy Confidential Information unless specifically authorized to do so. You may not disclose any Confidential Information during or after your engagement with TeamHealth without prior written consent of TeamHealth’s General Counsel. Improper use, disclosure or dissemination of Confidential Information will result in disciplinary action up to and including termination.

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. You must obtain prior, written approval from your supervisor, the legal department, and the Integrated Marketing Communications Department before publishing, making speeches, giving interviews, or making public appearances, including at professional meetings/seminars, that are connected to TeamHealth business interests and activities.

Securities and Insider Information

Associates may not discuss material, non-public information about TeamHealth or entities that do business with TeamHealth. Such information is defined as any information that could affect securities prices that is not generally available to the public. Material, non-public information may include plans for mergers, marketing strategy, financial results, or other business dealings. If you obtain access to material, non-public information about TeamHealth 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 public.

Accuracy, Retention, and Disposal of Records

Every associate is responsible for maintaining honest and accurate business documents and records. Documents and records may not contain false or misleading information. All documents and records are to be created, stored, retained, and destroyed in accordance with all applicable laws and the TeamHealth Records Retention Policy.

Coding, Billing, and Reimbursement

TeamHealth is committed to full compliance with all laws and regulations relating to coding, billing, and reimbursement.

All patient records will be coded based on the documentation that the clinician recorded in the medical record. Associates may not knowingly present or cause to be presented claims for payment or approval that are fake, fictitious, or fraudulent.

TeamHealth has rigorous documentation, coding, and billing procedures that must be followed by all associates. Appropriate training is provided to all associates involved in documentation, coding, and billing processes. TeamHealth utilizes oversight systems designed to verify that claims are submitted only for the medically necessary services rendered and that services are appropriately documented, coded, and billed as provided. These systems emphasize the critical nature of complete and accurate documentation of services provided.

TeamHealth is dedicated to ethical billing practices and does not condone or participate in fraudulent activities. If coding and billing errors are identified, they must be reported to leadership and corrected in a timely and appropriate manner. This includes making prompt refunds where needed. All associates are expected to comply with all relevant Medicare and Medicaid laws and regulations and third-party billing rules. TeamHealth does not routinely waive patient copays and deductibles or otherwise provide financial benefits to patients.

Physician Relationships

Business arrangements with physicians, physician groups, and healthcare facilities shall be in writing and shall comply with legal requirements described in the anti-kickback and physician self-referral laws.

Federal and state anti-kickback laws prohibit the knowing and willful payment of “remuneration” to induce or reward patient referrals or the generation of business involving any item or service payable by the Federal healthcare programs. In addition, the physician self-referral law says that if a medical facility has a financial relationship with a physician or a family member of the physician, then that physician may not refer patients to the facility for designated health services, which include inpatient and outpatient hospital services, and the hospital may not bill for such services, unless an exception to the law applies.

It is important that associates who interact with physicians, physician groups, and healthcare facilities, particularly regarding making payments for services rendered, providing space or services, recruiting physicians, and arranging for physicians to serve in leadership positions in facilities, are aware of the requirements of the laws, rules, regulations, and policies that address relationships between facilities and physicians.

Loyalty and Conflicts of Interest

While conducting TeamHealth business, associates are expected to place TeamHealth interests ahead of outside, commercial, or personal interests. Associates are prohibited from personally taking, or directing a third party to take, a business opportunity that is discovered through the use of TeamHealth property, information, or position. More generally, associates are prohibited from using TeamHealth property, information, or position for personal gain and from competing with TeamHealth. Associates 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 TeamHealth or soliciting TeamHealth's clients.

While associates should endeavor to avoid situations that might result in an actual or perceived conflict of interest, we understand that actual and perceived conflicts of interest may arise from time to time. To that end, TeamHealth maintains a robust conflict of interest review process, which requires associates to disclose actual or potential conflicts of interest so that they can be managed appropriately. Before engaging in any conduct that may result in a conflict of interest, consult your leader and review TeamHealth's Conflict of Interest Policy.

Relationships with Vendors, Suppliers, and Subcontractors

TeamHealth develops numerous relationships with vendors, suppliers, and subcontractors 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.

TeamHealth manages its relationships with vendors, suppliers, and subcontractors in a fair and reasonable manner, consistent with applicable laws and good business practices. Vendors, suppliers, and subcontractors are selected based on objective criteria, such as quality, service, and price. Contracting and purchasing decisions are based on the ability of the vendor, supplier, or subcontractor to meet the needs of TeamHealth and are not based on personal relationships, favors, gratuities, or contributions. Vendors, suppliers, and subcontractors are expected to abide by this Code of Conduct.

Outside/Dual Employment

Any outside work or other activity must not interfere with an associate's obligations to TeamHealth or reflect negatively on TeamHealth. Associates must consult with their leaders to determine whether the outside work or activity conflicts with their responsibilities to TeamHealth.

Gifts, Entertainment, and Business Courtesies

The exchange of gifts, entertainment, and business courtesies represents an area of potential conflict and may be perceived as an attempt to unduly influence a relationship. Associates cannot solicit, accept, or give payments or gifts to patients, vendors, clients, or potential clients other than as allowed by TeamHealth policies. The only types of gifts that are appropriate to accept or give are those of small value extended as a business courtesy, such as promotional items (pens, mugs), occasional reasonably priced meals, or other small tokens (flowers, candy). You should refer to the TeamHealth Charitable Contributions Policy, Conflict of Interest Policy, and Gifts to and from Business Partners Policy before you exchange a gift of any kind with a current or potential patient, vendor, or client. Contact the Compliance Department if you have any questions about these policies or regarding whether a gift is acceptable.

The following guidelines typically apply to gift giving/receiving:

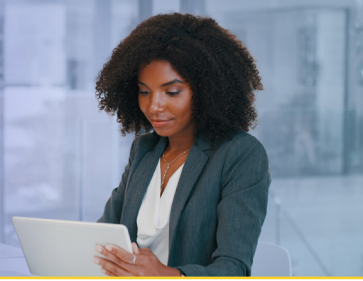
- Associates shall not give or accept gifts that exceed \$75 in value from a vendor or potential vendor or a client or potential client unless the gift has been reported and approved in writing, as documented in the TeamHealth policy. Gifts of nominal value, such as meal and entertainment courtesies 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.

Political Activities and Contributions

Associates may participate in the political process on their own time and at their own expense but may not do so on behalf of TeamHealth. Associates may not use their position at TeamHealth to further the political agenda of any person or group. Further, associates may not engage in lobbying or retain an outside lobbyist or consultant on behalf of TeamHealth without the written permission of TeamHealth's General Counsel.

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. Associates are free to give to any party or candidate on their own behalf using their personal funds, but they may not make any contribution on behalf of TeamHealth or with TeamHealth's funds. Political contributions are not reimbursable to associates as business expenses by TeamHealth (see TeamHealth's Political Contributions Policy).

Workplace Conduct and Practices



General

TeamHealth is committed to fostering an atmosphere that promotes honesty, integrity, and mutual respect. We maintain a positive work environment that supports our mission, vision, and values. We encourage and foster a workplace where associates are treated with fairness, dignity, and respect and are afforded the opportunity for professional growth while working in a team environment. It is each associate's responsibility to exhibit conduct that is professional, ethical, respectful, and honest to all others, including fellow associates, clients, patients and their families, and vendors.

Equal Opportunity Employment and Business Relationships

TeamHealth does not discriminate against applicants or associates on the basis of race, color, national origin, citizenship, sex, sexual orientation, gender identity, pregnancy, religion, age, disability, armed forces status, genetic information, or any other classification protected by federal, state, or local law with respect to any aspect of employment or contractual relationship.

TeamHealth is committed to providing equal employment opportunities to qualified individuals with disabilities, or individuals with known temporary limitations on their ability to perform the essential functions of their jobs based on a physical or mental condition related to pregnancy, childbirth, and related medical conditions.

TeamHealth will not retaliate against any associate who makes a good faith report of alleged harassment/discrimination or cooperates with any complaint investigation. Concerns about retaliation should be immediately reported to the associate's supervisor, manager, department head, a Human Resources representative, or by using the Compliance Hotline.

Employment/Screening

TeamHealth verifies the credentials and qualifications of all individuals seeking to work with TeamHealth and only hires/contracts with qualified individuals with appropriate experience and licensure.

Team members are responsible for maintaining all necessary professional credentials and shall always comply with federal and state requirements applicable to their respective disciplines. TeamHealth will not allow any licensed associate to work without all required, valid, and current licenses.

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.

Harassment/Workplace Violence

Every associate has the right to work in an environment free of harassment, discrimination, and violence. TeamHealth does not tolerate any form of harassment based on race, color, national origin, citizenship, sex, sexual orientation, gender identity, pregnancy, religion, age, disability, armed forces status, genetic information, or other protected category. Harassment is verbal or physical conduct that denigrates or shows hostility toward an individual or creates an intimidating, hostile, or offensive working environment because of his/her race, color, national origin, citizenship, sex, sexual orientation, gender identity, pregnancy, religion, age, disability, armed forces status, genetic information, or other protected classification. Harassment may include, but is not necessarily limited to, epithets, slurs, jokes, hateful expression, or other verbal or physical conduct relating to an individual's race, color, national origin, citizenship, sex, sexual orientation, gender identity, pregnancy, religion, age, disability, armed forces status, genetic information, or other protected classification. Sexual harassment consists of unwelcome physical contact, advances, requests for sexual favors, and other inappropriate communications or verbal or physical conduct of a sexual nature that creates an offensive or hostile work atmosphere.

TeamHealth does not tolerate workplace violence, which includes threatening, aggressive, or abusive behavior. Any form of hate speech is strictly prohibited. Associates are prohibited from possessing firearms or other weapons on TeamHealth premises or while working at client facilities on behalf of TeamHealth.

All incidents of harassment, discrimination, or workplace violence must be reported to a TeamHealth supervisor, manager, department head, a Human Resources representative, or by using the Compliance Hotline. TeamHealth will not retaliate against any associate who makes a good faith report of alleged harassment or violence or cooperates with any complaint investigation.

Substance Abuse/Impairment

TeamHealth is committed to an alcohol-free and drug-free workplace. Associates are expected to report for work free of the influence of alcohol, mind-altering substances, and illegal substances. Working under the influence of alcohol, mind-altering substances, or any illegal drug, or using, possessing, or distributing illegal drugs may result in immediate termination of employment or contractual relationship.

Consistent with applicable law, TeamHealth may use drug and alcohol testing as a means of enforcing this policy and, subject to state law, reserves the right to require an associate to submit to drug or alcohol tests in any of the following situations:

- Upon hiring the associate;
- Following an on-the-job injury;
- On a periodic or random basis;
- Reasonable suspicion of a violation of this policy; and
- Follow-up to a substance abuse treatment program.

Environmental Health and Safety

TeamHealth is committed to providing a work environment that is safe and free from occupational hazards. We comply with all federal, state, and local laws pertinent to employee health and safety. We require the use of appropriate protective equipment and measures and insist that work is completed in a safe and responsible manner. We comply with all federal, state, and local laws pertinent to the environment, including those related to the handling, storage, use, and disposal of pollutants, hazardous materials, and infectious wastes that might be used or generated in the course of TeamHealth operations. Associates are expected to immediately report any workplace injury or unsafe condition to their leader so that timely corrective action can be taken.

Responsible Use of Social Media

Social networking and social media blogs or posts should be respectful, professional, and courteous at all times. Protected health information, employee information, and confidential business information cannot be posted to any social media site unless expressly approved by TeamHealth's General Counsel. 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 workplace will be investigated and may result in the termination of employment or contractual relationship.

Legal and Regulatory Compliance



Deficit Reduction Act of 2005

TeamHealth is committed to complying with the requirements of Section 6032 of the Federal Deficit Reduction Act of 2005 and to preventing, detecting, and correcting any fraud, waste, or abuse. Associates shall comply with all applicable federal and state laws pertaining to false claims and statements, whistleblower protections under these laws, and TeamHealth policies and procedures for preventing, detecting, and correcting fraud, waste, and abuse.

Government Inquiries and Investigations

TeamHealth cooperates with and properly responds to all government agency inquiries and investigations. If you are contacted by a federal or state law enforcement or regulatory agency representative requesting information about any aspect of TeamHealth, immediately notify your leader, the Compliance Department, and the Legal Department before responding to such inquiries.

Associates must never:

1. Destroy or alter any TeamHealth 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 associate or any other person to provide false or misleading information to a government investigator or to fail to cooperate with a government investigation.

TeamHealth Assets

TeamHealth assets, which include materials, supplies, equipment, information, and employee work time, shall be used and maintained primarily for business-related purposes. Associates shall not use these resources in a manner that could be wasteful or embarrassing to TeamHealth. Any use of TeamHealth assets for personal financial gain unrelated to TeamHealth is prohibited.

Associates may only use logos, trademarks, service marks, brand names, copyrighted materials and other intellectual property owned by TeamHealth as approved by the Integrated Marketing Communications Department. 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.

All TeamHealth communications systems, electronic mail, Internet and Intranet access, and voicemails are the property of TeamHealth. Limited responsible personal use of communications systems is permitted, but associates should have no expectation of privacy while using TeamHealth communications systems. TeamHealth reserves the right to monitor the use of its communications systems and take appropriate disciplinary measures in the event of misuse.

TeamHealth leaders are responsible for establishing appropriate internal controls within their areas of responsibility to safeguard TeamHealth assets, ensure the accuracy of financial records and reports, and maintain accurate reporting of all transactions. All associates are required to follow the rules and practices for safeguarding TeamHealth assets.

The TeamHealth Compliance and Ethics Program



The TeamHealth Compliance and Ethics Program is intended to demonstrate the organization's commitment to the highest standards of integrity, ethics, and compliance. The Compliance and Ethics Program is supported at all levels of the organization. The Chief Compliance and Privacy Officer is responsible for implementing and managing the Program, while the Board Compliance Committee and Executive Compliance Committee provide direction, oversight, and guidance to ensure that high standards of business, medical, legal, and personal ethics are met within the organization.

Program Structure

The Compliance and Ethics Program includes the following elements:

1. Policies and procedures, including this Code of Conduct,
2. Oversight by dedicated compliance officers and committees,
3. Ongoing training and education,
4. Anonymous reporting mechanisms,
5. Investigation of all reported concerns,
6. Auditing and monitoring activities, and
7. Consistent and appropriate corrective actions.

Additional information regarding each of these elements is available on the TeamHealth website.

The Compliance and Ethics Program has the following goals:

1. Increase awareness of compliance responsibilities.
2. Routinely audit and monitor TeamHealth activities to validate compliance with applicable, laws, rules, regulations, and policies.
3. Provide Associates with avenues for addressing compliance and ethics concerns.
4. Investigate and remediate reported compliance and ethics concerns.

Reporting Compliance Concerns



Obligation to Report

TeamHealth is committed to ethical and legal conduct that is compliant with all laws, rules, regulations, and TeamHealth policies. Each associate has an individual responsibility to report any activity by any associate or vendor that appears to violate laws, rules, regulations, or policies or encourages, directs, facilitates, or permits non-compliant behavior. Reporting allows the potential problem to be investigated and addressed in a timely and appropriate manner.

What to Report

Report concerns about any legal, ethical, safety, or behavioral issues or activities that you think may be impermissible. Your reasonable belief that an activity may violate a law, rule, regulation, or policy is sufficient to initiate a report. When determining whether to report a concern, consider the following:

- Is the activity legal? Is it ethical?
- Does the activity violate a TeamHealth policy?
- How would the public perceive the activity?

How to Report

You may report questionable activity in person, by email, by telephone, or in writing. When possible, we encourage reporting concerns first to your immediate supervisor or manager. When concerns cannot be properly addressed through the normal reporting structure, you are encouraged to report concerns to another member of TeamHealth leadership, the Human Resources Department, the Legal Department, the Compliance Department, or the Compliance Hotline.

The Compliance Hotline is available 24 hours a day, 7 days a week, and is administered by an independent third-party organization. Concerns reported via the Compliance Hotline will not be traced or recorded, and reporters may choose to remain anonymous.

The TeamHealth Compliance Hotline can be accessed as follows:

Telephone: 888.315.2362

Website: www.teamhealthcompliance.com

The Chief Compliance and Privacy Officer or designee will thoroughly and impartially review all reported concerns received by the Compliance Department. All allegations will be thoroughly investigated to determine the appropriate resolution. Based on the nature of the concern, the matter may be referred to another TeamHealth department to perform the investigation and determine the appropriate resolution. All associates are required to cooperate with investigative efforts.

Non-Retaliation Policy

TeamHealth will not permit any form of retaliation against any person who seeks advice, reports a concern in good faith, or cooperates in an investigation in accordance with TeamHealth policy. Anyone who deliberately makes a false or malicious report with the intent of harming or retaliating against another individual will be subject to disciplinary action up to and including termination of employment or contractual relationship.

Corrective Action

Appropriate corrective actions will be taken when an internal investigation substantiates a compliance violation. Corrective actions will be determined based on the nature, severity, and frequency of the violation, and may include notifying the appropriate government agency, modifying internal policies and procedures, implementing additional education, and instituting appropriate disciplinary action.

Additional Resources

While the Code of Conduct provides general guidance, there are additional resources available to you as you work with TeamHealth. For more information regarding the TeamHealth Compliance and Ethics Program, please call the compliance department at [865.293.5317](tel:865.293.5317). The Compliance and Ethics hub on Zenith includes compliance and privacy policies and procedures and educational materials regarding various compliance and privacy topics. The Associate Handbook and related policies are available on the Human Resources hub on Zenith. Finally, your normal reporting structure, beginning with your immediate supervisor or manager, is an excellent source of information.

Code of Conduct Acknowledgment



By my acknowledgment below, I certify that:

- I have received and 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 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 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.



TEAMHealth[®]

teamhealth.com