



Our Code of Conduct



A COMMUNITY BUILT ON CARE

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Performance with Purpose

We are in the
business of helping
and caring for others,
and we take great
pride in what we do.





Dear Colleagues,

Our commitment to ethics and compliance is paramount to the people we serve. We must act with integrity in everything we do, every day – as individuals, and as an organization. Ethical behavior earns the trust of our patients, physicians as well as our stakeholders, and that’s why our Code of Conduct is so important to our Company.

The following pages outline the key tenets of the Code in what we hope is an easy to navigate, user-friendly guide. In here, you will find business conduct policies to which all of us must strictly adhere, as well as examples of common questions that might arise in the workplace. We have also included tips, numbers to call and procedures to follow.

An integral part of maintaining our strong culture of compliance is the commitment by everyone in the organization to read, understand and follow the Code. If you have questions, reach out to your local compliance resource.

Thank you for your service to our communities, carried out with integrity every day.

A handwritten signature in black ink, appearing to read 'Saum'.

Saum Sutaria, M.D.
Chairman of the Board
& CEO





Our Values
Matter

Strive for the best in quality and care

Our Core Values

We define ourselves by our values.

This Code of Conduct describes how to make decisions that support our values and lead to effective compliance. Because values-based decisions are so critical, following this Code is a condition of employment for every employee at Tenet and USPI, henceforth referred to as our Company.

Our Values speak to who we are, what we stand for, and what we **CARE** about:

Compassion and respect for others and each other, supporting our communities and advocating for our patients

Acting with integrity and the highest ethical standards—always

Results delivered through accountability and transparency

Embracing all people in our workplace and in the communities we serve

Our values help us make decisions that are consistently in the best interests of our patients, communities, colleagues, shareholders, and the Company. Doing the right thing is your responsibility and nobody has the authority to instruct you to ignore this Code.



Mission: To provide quality, compassionate care in the communities we serve. This is what we do every day. Everyone contributes to this mission, by either directly providing care or supporting those who do. It's short, simple and direct, and we must all be committed to fulfilling this mission and doing it well.

Vision: To consistently deliver the right care, in the right place, at the right time and to be a premier organization to work, where patient care and saving lives remain our focus. Our vision reflects our aspirations for the future and the goals we work toward together. It provides hope of what's to come, including how we have the opportunity to participate in some of the most important moments in our patients' lives and continue to improve the way care is delivered.

Follow Our Code

All your work must follow our Code, our policies, and the law.

We are committed to acting ethically and responsibly every day and with every interaction. Our Code and our Company policies give you the information you need to perform your job ethically. It is your responsibility to know and follow the policies that apply to the work you do and the decisions you make.

This Code defines what it means to be a Company employee and the high standards we commit to follow.

Lead by Example

Each of us must act with integrity and inspire trust.

We expect all employees to act ethically; however, each manager and leader has the increased responsibility of leading by example. We expect our leaders and managers to serve as positive role models and inspire others to embrace our Code by:

- Rewarding integrity
- Encouraging ethical decision-making
- Creating a transparent and open work environment
- Preventing retaliation against those who speak up
- Seeking help in resolving and escalating issues

Our Company relies on our leadership to reinforce the principles of our Code throughout all levels of our workforce.





Speaking Up

Be the voice of integrity

Your Role

Speaking up is always the right thing to do.

Being the voice of integrity is not always easy, but when we raise integrity concerns, we make our Company stronger and protect our colleagues from harm. We have experts in many areas of our Company that handle and investigate reported concerns. At the same time, you have an *obligation* to promptly raise a concern when you see a situation in which our integrity, principles, or policies may not be followed. We respect confidentiality and your decision to remain anonymous. However, if you identify yourself, we can more easily follow up with you and provide feedback. We will only share your identity and information on a "need-to-know" basis. You should also be aware that you have an obligation to cooperate with any investigation into a potential violation of this Code or any of our policies.

Raising Questions

If unsure, ask!

The Code, by its very nature, cannot describe every situation that could arise in your daily work. If you cannot find an answer in the Code, or if you have questions on how to interpret the Code, ask for help.

Report Concerns

Raise potential violations.

If you believe something may be a violation of our values, our Code, our policies, or the law, you should speak up and report it. Similarly, you should also report any instances where someone has asked you to violate the Code. All reports of potential violations must be made in good faith.

We take your concerns seriously and handle them with care. Reports not made in good faith are also subject to disciplinary action.



Q:

How do I know when I should seek guidance?

A:

If something does not seem right, then it might not be the right thing to do. Ask yourself:

- **How would it look on the front page of the newspaper?**
- **Am I sure this course of action is legal? Is it consistent with our values, Code, and policies?**
- **Could it appear unethical or dishonest?**
- **Could it hurt our Company's reputation?**
- **Will this hurt our employees, patients, physicians, or investors?**

Reporting Channels

You have several channels to seek guidance or make a report.

Channels include:

- **Your manager, others in your chain-of-command, or Human Resources:** Your managers and Human Resources are excellent resources for guidance or concerns related to many Company and job-specific policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, and issues related to the work environment.
- **Company Intranet:** You may also seek guidance or report concerns by filling out the [Online Submission Form](#).
- **Ethics Action Line:** The Ethics Action Line is an anonymous reporting mechanism. The Ethics Action Line is answered 24 hours a day, 7 days a week by a third party and can be reached at 1-800-8ETHICS or ethics@tenethealth.com.
- **Ethics and Compliance Department or Law Department:** For issues involving actual or potential Code or legal violations, you should seek guidance or raise concerns to the Ethics and Compliance Department or the Law Department.

If you believe a reported concern has not been adequately addressed, report it again in a different way. We all have a responsibility to timely escalate matters that appear to remain unresolved.



Q:

What should I do if my manager asks me to perform a task that I believe might violate our Code or a law?

A:

If you feel comfortable doing so, raise your concerns openly and honestly with your manager. If you are not satisfied with your manager's response, or otherwise feel uncomfortable speaking to your manager, raise the issue through any other reporting channel. You should never knowingly violate our Code, a policy, or a law simply because a manager directs you to do so or because you did not ask for guidance.

Examples of issues involving actual or potential Code or legal violations:

- Accounting or auditing errors or misrepresentations
- Fraud, theft, bribery, and other corrupt practices
- Antitrust or insider trading violations
- Discrimination or harassment
- Actual or potential conflicts of interest
- Payment to a physician based on the value or volume of referrals

Remember, nothing in this Code prevents you from reporting potential violations of law to relevant government authorities.

Consequences of Non-Compliance

Non-compliance can have serious repercussions.

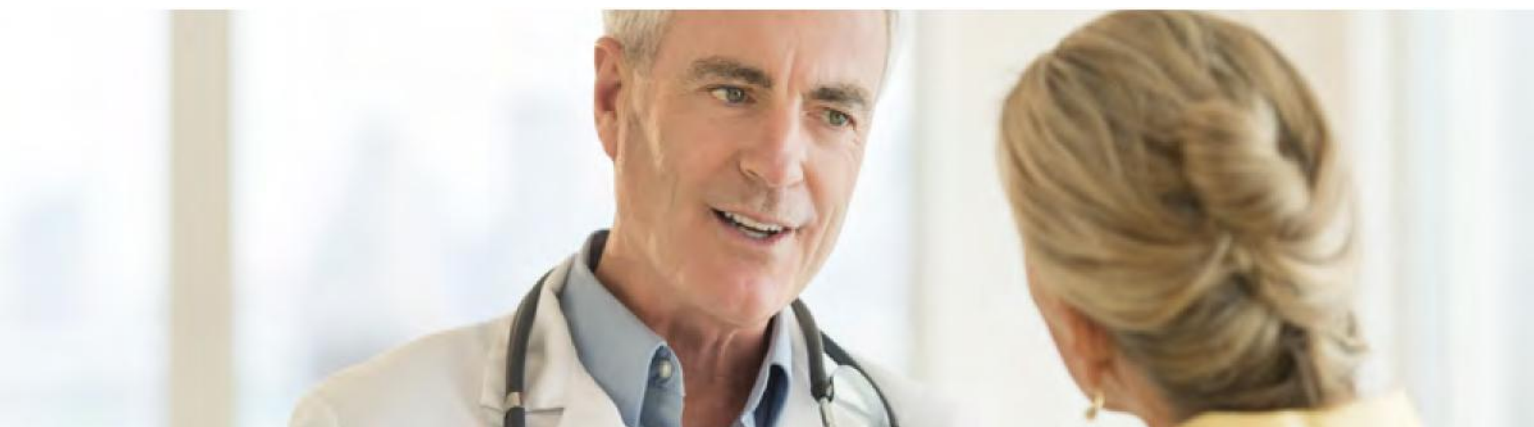
- **For Our Company:** Damage to our Company's reputation, prosecution, fines, disclosure to government agencies, or loss of business
- **For Our Colleagues:** Prosecution, fines, or imprisonment; disciplinary actions; damage to personal reputation; or severe injury or illness
- **For Our Investors:** Loss of confidence and investment value, or damage to reputation for good corporate governance
- **For Our Patients:** Loss of patient trust or damage to our patients' overall health

Share Your Concerns Without Fear of Retaliation

We do not retaliate against those who raise concerns or cooperate with an investigation.

Our Company has a commitment to non-retaliation and protecting the rights of individuals reporting issues in good faith or cooperating in an investigation. Any retaliation—whether direct or indirect—against employees who raise a concern in good faith or cooperating in an investigation is grounds for discipline up to and including termination.

The Company takes reports of retaliation seriously. If you feel that you have experienced or witnessed retaliation, immediately report it to your manager or contact the Ethics Action Line. The Company will investigate it and take the proper steps to protect those who report retaliation.



How We Handle Concerns Involving Our Systems and/or Colleagues

We fairly examine every integrity concern.

At our Company, every concern is examined thoroughly through the process outlined below. Managers must escalate employee concerns to a compliance professional. The following process displays what happens after you submit a report through the Ethics Action Line (EAL):

1

WRITTEN REPORT IS CREATED

When you file a report through the EAL, the third-party vendor will provide the Ethics Advisor with a written report. The EAL does not use Caller ID, so your calls can remain anonymous if you wish.

When you file a report via email, you will receive a response within one business day.

2

YOUR CASE IS INVESTIGATED

Once a report is received, the EAL Advisor assigns the case to an investigator and appropriate subject matter experts to conduct an investigation. Human resources related concerns are referred to an employee relations advisor for resolution through our employee relations investigation process.

3

RESOLUTION ACHIEVED

All cases remain open until each allegation has been addressed for resolution. Once a case is closed, the Ethics investigation system provides an automated response back to the third-party vendor. This ensures the vendor is informed that the case is closed in the event the person who reported the incident seeks a status update.

Regardless of how you submit a report, you will receive a case number so you may check the status at any time, and/or provide additional information.

Ethics Action Line—24 hours a day, 7 days a week:

ethics@tenethealth.com

1-800-8ETHICS

[Online Submission Form](#)





Respect in the Workplace

Be considerate of yourself and others

Human Rights

We respect employee rights.

We recognize the importance of supporting and promoting fundamental human rights in all our operations. We have programs and policies that:

- Provide fair wages, benefits, and other conditions of employment
- Recognize employees' rights to freedom of association
- Provide humane and safe working conditions
- Prohibit forced or child labor

Always check your actions to ensure they do not violate or contradict any of the basic human rights principles noted above. If you suspect human rights abuse within our Company, speak up and report it.

All employees should:

- **Respect the diverse backgrounds of our employees and co-workers**
- **Give qualified individuals the chance to develop and succeed**

Anti-Discrimination

We treat employees equally regardless of background.

The Company follows all laws covering freedom of association, collective bargaining, immigration, wages and hours, as well as laws prohibiting forced or child labor. We believe in providing equal opportunities in employment for women, minorities, people with disabilities, and veterans.

Each of us should have the opportunity to reach our full potential. To accomplish this, we believe in fostering a work environment free of discrimination. Our Company prohibits treating anyone unfairly in matters that involve recruiting, hiring, training, promoting, compensation, or any other term or condition of employment.

Employment decisions must always be in compliance with the law and based on merit, qualifications and job-related performance, and without regard to non-job-related characteristics such as:

- Race, color, or ethnicity
- Citizenship, ancestry, or national origin
- Disability
- Sex, gender, or gender identity
- Marital status or pregnancy
- Age
- Religion
- Sexual orientation
- Veteran status
- Any other legally protected status

Anti-Harassment

Employees should feel comfortable in the workplace.

Harassment includes unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive, or hostile work environment. We seek to create a work environment that is free from harassment of any kind and offensive or disrespectful conduct. Our Company follows all state and local laws prohibiting harassment. While the legal definition of harassment may vary by local law, we consider the following examples to be unacceptable behavior:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender, or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Unwanted physical activities (e.g., touching, hugging, or blocking someone's path)
- Showing hostility towards others

You should never act in a harassing manner or otherwise cause your co-workers to feel uncomfortable in their work environment.



What is Sexual Harassment?

Sexual harassment is bullying of a sexual nature, coercion of a sexual nature, or an inappropriate promise of rewards in exchange for sexual favors. Sexual harassment may consist of verbal, visual, or physical conduct of a sexual nature that is unwelcome or that makes someone feel uncomfortable. It can take many forms, such as:

- **Unwanted touching, comments about appearances, or sexual advances**
- **Sexually oriented jokes, pictures, texts, or email messages**
- **Display of obscene pictures, posters, or pornography**

It is important to remember that harassment, sexual or otherwise, is determined by how your actions impact others—regardless of intentions.

Substance Abuse

We are committed to a drug-free workplace.

Drugs may include illegal drugs, controlled substances, alcohol, or misused prescription medication. If you work under the influence of drugs or alcohol, you pose an unacceptable safety risk to yourself and others. We perform our job duties free from the influence of any substance that could affect job performance. We therefore prohibit:

- Working under the influence of alcohol, illegal drugs, or controlled substances
- Possessing, selling, using, or distributing illegal drugs or controlled substances while working or on Company property except in the legal and appropriate provision of controlled substances at one of our patient care facilities

If you have a drug or alcohol problem, ask for help.



Q:

Over the past few months I've been dealing with personal issues that are causing emotional and financial stress. My doctor has prescribed medication to help me get through the day, but I'm beginning to think I may have a substance abuse problem. What should I do?

A:

You should contact your healthcare professional or the Human Resources Department to discuss questions or concerns about substance dependency or abuse.

You can also contact our Employee Assistance Program at 866-335-2340.

Workplace Violence

We are committed to a safe working environment.

Our safety programs include a zero-tolerance policy for violent behavior in our workplace both on- and of-site. Our Company also prohibits the possession of weapons in the workplace. You should not act in a way that could cause another individual to feel threatened or unsafe. This could include:

- Verbal assaults
- Threats or any expressions of hostility
- Intimidation
- Aggression or hazing

Employment Data

We respect employee privacy rights.

As part of our everyday work, some employees have access to personally identifiable information (PII). PII is any information that can be used to identify an individual (e.g., full name, birthdate, or social security number). We use, store, and transfer personal data per employment data protection standards, related procedures, and local law. We do not disclose employee PII unless required by law or when there is a legitimate business need and with the consent of the employee.

**Speak up—
report threats or
potential violence
to your manager.**







Ethics and Business Activities

Build goodwill and relationships thoughtfully

Gifts, Entertainment, and Other Favors

All gifts, entertainment, and other favors provided or received must be reasonable.

Accepting or giving gifts, entertainment and other favors can potentially create a conflict of interest. "Gifts, entertainment, and other favors" includes anything of value. Examples include, but are not limited to, meals, lodging, discounts, prizes, travel, tickets, money in any form, or stock.

Giving Gifts, Entertainment, or Other Favors

We never offer anything of value in exchange for referrals or other business.

We are committed to winning business based on the superior quality features and benefits of our services. Offering gifts, entertainment, or favors in order to win or keep business is unethical and may be illegal. However, there are occasions where it is acceptable to give a modest gift or entertainment to a business contact as part of a business relationship. Rules regarding giving and receiving gifts with patients and physicians are in the box to the right. In addition, and in general:

- Do not give gifts, entertainment, or favors to the same person or company more than occasionally
- Limit gifts, entertainment, and favors to what is reasonable and appropriate under the circumstances
- Do not give gifts, entertainment, or favors if you are doing it to make the other person feel obligated to give business to our Company
- Do not provide gifts or entertainment that may appear to violate our commitment to respect each other

- Make sure you are not violating the other company's gift and entertainment policy
- Never give cash, checks, money orders, gift certificates, loans, or other types of money
- Gift Cards **Not Permitted** include VISA, American Express, and Mastercard or similar
- Gift Cards **Permitted** must be designated by store and/or location (e.g., Starbucks, Target, etc.)

Allowed (Patients):

- Gifts, entertainment, and other favors to patients not exceeding \$15 per item and \$75 in total per year per patient or potential patient
- Patient Vouchers (\$5) are permitted to provide service recovery and used at the facility cafeteria, gift shop, etc.

Allowed (Physicians):

- Gifts, entertainment, and other favors received by a Company employee from a physician if the amount does not exceed \$50 per item per employee and \$100 in total per year
- Infrequent designated gift cards of \$25 or less
- In limited circumstances, gifts, entertainment, and other favors purchased by the Company for a physician if the value of the item is within the non-monetary compensation limit
- Occasional business meals and entertainment with or for physicians within the non-monetary compensation limit

Not Allowed (Patients nor Physicians):

- Cash or other cash equivalents to/from patients, vendors, customers, or physicians
- Free health care items or services purchased or provided to patients or physicians
- Trips purchased for or received from vendors, customers, patients, or physicians
 - The Company shall pay for all business trips taken by its employees

Not Allowed (Patients):

- Gifts from patients; we may not accept or solicit gifts from patients in any form
- Business meals or entertainment for/from patients

Accepting Gifts, Entertainment, or Other Favors

We may not accept anything that impacts our judgment.

In the course of working for our Company, you may be offered gifts, entertainment, or other favors from customers, suppliers, vendors, or other business contacts. Accepting these usually makes us feel like we should do something in return. This could impact our ability to make objective business decisions in the best interest of our Company. Rules regarding giving and receiving gifts with patients and physicians are noted on the previous page. In general, the only kinds of gifts and entertainment you may accept from anyone who does or may do business with our Company are:

- Infrequent gifts of low value (not exceeding \$25) such as pens, calendars, mugs, or small promotional items related to business
- Non-cash perishable gifts such as cookies, gift baskets, chocolates, or flowers that are shared with a department
- Occasional reasonably-priced meals with a business contact to discuss business matters
- Occasional attendance at local sports, concerts, theater or other cultural or social events, where tickets are generally available to the public and not to exceed more than once per year per vendor, and as long as the vendor is present and Company business is discussed.

Be sure your manager is aware of any gift or business courtesies you receive. Each of us must not:

- Accept anything if it will make you feel you should do, or promise to do, anything in return
- Accept anything lacking a business purpose
- Accept anything in return for giving someone Company business

- Accept any cash or cash equivalent (contact the Ethics & Compliance Department, your Compliance Officer or the Ethics Action Line to discuss gift cards)
- Ask for a gift or other business courtesies
- Accept anything involving travel or overnight lodging expenses such as vendor trips or conference registration fees. If asked to speak at a conference, please follow-up with your Compliance Officer for more information.

If you receive anything outside of these guidelines, you should return it and explain that our policy does not allow you to keep it. If it potentially violates a social custom to return it, talk to your manager about donating the item to charity or another solution. If you are not sure whether the gift, entertainment or favor offered to you complies with this policy, talk to your manager or Compliance Officer.

If unsure, contact your manager or Compliance Officer first.



Q:

A vendor said he was unable to attend the game tonight and asked me if I wanted his two tickets. Can I accept them?

A:

Vendors giving us tickets is considered a gift and is not allowed. Attendance is allowed if the ticket is available to the public and not more than once a year. Attendance is allowed if it is with the vendor, the ticket is available to the public, and not more than once a year.

Gifts to Government Officials

Offering even a simple gift or meal to a government official can be illegal.

Generally, our Company may not accept or request gifts from foreign or federal government officials or their agents. Before interacting with any government officials, you should familiarize yourself with our Anti-Bribery and Anti-Corruption policy and contact the Law, Government Relations or Compliance Departments for guidance.

As a federally-registered lobbying entity, the Company must never provide any gift, meal, entertainment, or other item of value to any member of Congress or their staff, unless that item qualifies for one of several exceptions to the congressional gift rules.

As we continue to expand our global footprint through services within the Global Business Center, engagement of offshore suppliers and vendors, and business development activities, we must limit giving or offering gifts to foreign officials except as expressly authorized by our Anti-Bribery and Anti-Corruption policy.

Insider Trading

Trading securities based on non-public information is a crime.

Inside information is anything that is important enough to potentially affect a company's stock price, but is not yet public. Some examples of inside information may include:

- Financial results
- Earnings projections
- Changes in senior management
- Information about acquisitions

If we have access to inside information about the Company or one of our business partners, we may not trade in that company's stock until the information is public, nor may we "tip" others to do so. Trading on such information, or "tipping" others, is known as insider trading and is a violation of federal law. Please contact the Law Department for more information.

Conflict Of Interest

Don't let your personal interests interfere with the Company's best interest.

In our work, we have a duty to put the interests of the Company before our own. A conflict of interest occurs whenever someone might question whether we are acting for the Company's benefit or for our own personal gain. Conflicts of interest may arise with family, friends, or anyone with whom you have a personal relationship.


If you think you may have a potential or actual conflict of interest, you have an obligation to report it promptly to the Company so that a determination can be made regarding next steps. Many times, conflicts can be resolved through disclosure and an open and honest discussion. Other conflicts may require reassignment of roles or withdrawal from certain business decisions.

Failure to report and withdraw from conflicts of interest can result in disciplinary action up to and including termination.


Examples of Potential Conflicts of Interest*

Personal Relationships	<ul style="list-style-type: none">• Contracting with or conducting Company business with family or friends• Reporting to, supervising, hiring, or promoting a relative or someone with whom there is a close personal relationship
Personal Investments or Financial Decisions	<ul style="list-style-type: none">• Investment in stocks, bonds, options, or other ownership interests (including those of close relatives) with potential to impact decisions or Company business
Company Property, Information, Position, or Resources	<ul style="list-style-type: none">• Utilizing Company assets for personal benefit or the benefit of others

* These are only a few examples; we must report any other relationships that could be perceived as potential conflicts.



Remember—Having a conflict of interest is not a Code violation. Not disclosing it is.



To decide if you have a conflict of interest that should be reported, ask yourself these questions:

- Do my outside interests influence my objectivity?
- Do I personally benefit from my involvement in this situation?
- Does a friend or relative of mine benefit from my decision?
- Could my participation in this activity make it harder to do my job?
- If the situation were public, would I be proud of my decisions?

Political Activities

We encourage participation in civic and community activities.

Our culture fully supports service and the needs of others. We respect our colleagues that make personal decisions to use their own time or money towards political or community activities. These activities should occur on personal time and not result in conflicts of interest. We must also make sure our political views do not interfere with our co-worker or patient relationships.

From time to time, our Company may communicate information related to public topics. This information is not meant to pressure you to adopt certain ideas or support certain causes. Instead, we believe it is part of transparency into the Company's position and opinions.

There are complex federal and state restrictions regulating the forms of political contributions companies can offer. We follow all laws in promoting our Company's position and the Government Relations Department must approve any corporate political contributions.

Hiring of Former and Current Government Employees

We do not use employment with our firm as a potential reward for prior actions.

The regulations of certain anti-bribery laws and conflict of interest policies cover the recruitment of former or current U.S. government employees. For example, hiring an employee directly from a fiscal intermediary or Medicare Administrative Contractor requires certain regulatory notifications.

Consult the Human Resources Department, the Ethics and Compliance Department, or the Law Department prior to recruiting government employees.









Corporate Responsibility

Do more than just the right thing

Quality of Patient Care and Safety

We deliver safe, effective, efficient, and compassionate patient care.

Our goal is to provide high quality, cost effective healthcare to all our patients. The Company sets and supports a standard of excellence within our facilities. We treat all patients with dignity and compassion and only provide necessary and appropriate care.

The Company has a comprehensive program to promote the quality goals of the organization. Company facilities focus on:

- Delivering services to patients that focus on their specific needs
- Utilizing innovative technology and solutions to improve quality care
- Establishing a culture that prioritizes patient safety
- Creating successful credentialing and peer review mechanisms for our medical staff

In any situation, if you have any question about our commitment to quality or patient safety, you must raise this concern to your manager, Compliance Officer, or the **Ethics Action Line** at **1-800-8ETHICS** or ethics@tenethealth.com.

Ethics Action Line:

ethics@tenethealth.com

1-800-8ETHICS

Online Submission Form



Q:

What should I do if a patient refuses treatment?

A:

Patients have the right to refuse care, treatment, and services. We must take reasonable steps to determine the patient's wishes and exercise the patient's rights. Patient preferences are honored within the limits of the law and our organization's mission, philosophy, values, and capabilities. If you have a question regarding patient rights, please contact your Manager, the Compliance Officer, or the Ethics Action Line.

Patient Rights

Our patients come first.

We have an ethical responsibility to make our patients feel secure while in our care. We treat patients with respect and make no distinction in the availability of services based on age, gender, disability, race, color, religion, sex, sexual orientation, gender or gender identity, national origin, ability to pay, or any other legally protected status. We respect the various backgrounds and cultures of our patients and work diligently to respect and support each patient's unique needs.

We encourage patient and family involvement in all aspects of care. Patients, family, and other caregivers are participants in the care and discharge process; therefore, we give priority to their choices whenever possible. We provide a written statement of rights to patients and families upon admission. At the same time, we must follow our policies on informed consent, advance directives, discharge planning, and patient participation in the care plan. Our Company strives to provide health education, health promotion, and illness prevention programs as part of our overall effort to improve the quality of life for our patients.

Patients and families trust us with highly sensitive medical information. It is our duty to protect this information, follow all state and federal privacy laws, and report any potential privacy concerns.

Company Resources

We use Company resources for Company business.

We rely on you to manage Company resources honestly and efficiently. Company resources are intended for legitimate business purposes. You also have a responsibility to protect our equipment and other resources from theft, loss, damage, waste, or abuse. Protecting Company funds is particularly important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts.

You must always:

- Ensure Company funds are properly used for their established business-related purpose
- Obtain required approval before incurring an expense
- Accurately record all expenses in Company books and records
- Verify compliance with our policies

Examples of Company Resources

Physical property:

- Facilities
- Materials
- Supplies
- Equipment
- Company funds

Intangible assets:

- Company time
- Confidential information
- Intellectual property
- Information systems

Email, Internet, and Information Systems

Use Company email, internet, and information systems responsibly.

We provide our information technology systems for authorized business purposes. Our use of these systems must follow our privacy and information security policies and procedures. For example, we should never share passwords, leave laptops unattended, or download unapproved software to our computers.

All employees complete mandatory privacy and cybersecurity training during onboarding and receive an annual refresher training thereafter. In addition, we conduct simulated phishing campaigns and periodic privacy and cybersecurity awareness activities.

If there is a potential incident involving the compromise of company systems or data, including the loss or theft of a laptop or other device, it must be immediately reported to the [Incident Response Team](#).

To the extent permitted by local law, our Company reserves the right to monitor activity on our resources.

You may engage in reasonable incidental personal use of phone, email, and the internet if such usage does not:

- Consume a large amount of time
- Interfere with your work performance or that of others
- Involve illegal, sexually explicit, discriminatory, or other inappropriate material
- Relate to outside business interests
- Violate our Code or any Company policy

Environmental and Workplace Welfare

We protect the earth's natural resources.

We seek out responsible business actions and sustainable solutions that support our efforts to be efficient and effective corporate citizens. Our team prioritizes innovation and is continually looking for ways to conduct business in more environmentally responsible ways.

We are committed to:

- Ensuring compliance with all applicable environmental, health, and safety (EHS) laws and internal Code
- Educating and training employees to work in a safe, environmentally friendly manner

We are all responsible for:

- Understanding or following applicable EHS requirements
- Reporting any injuries and illnesses at work
- Disclosing any issues that could impact the environment or community health or safety
- Reporting concerns about potential non-compliance

Protecting the environment and the health and safety of our colleagues, patients, physicians, visitors, and the communities in which we work is a corporate priority and makes good business sense.



Q:

You are cleaning out a supply closet and come across a few containers of liquid cleaning solvents and sterilizing solutions that look out-of-date. You are unsure if these liquids are hazardous. What should you do?

A:

You should check the appropriate facility procedures for disposal of potentially hazardous chemicals. If unable to find enough information, you should escalate the question to your supervisor.

Media and Investor Inquiries

Please refer inquiries from the investing community and members of the press to the Investor Relations and Corporate Communications Departments.

This includes formal and informal requests for information, whether made in person, over the phone, in writing, or using any form of social media. The Communications Department may be contacted [here](#) and the Investor Relations Department may be contacted [here](#).



Do not share information with external parties. Contact the appropriate group:

Inquiries from:	Contact:	
The Media or Public	Corporate Communications	469-893-2640
Financial analysts or investors	Investor Relations	469-893-6992
Regulatory bodies, law firms, or regarding legal concerns	Law Department(s)	1-800-8ETHICS or 469-893-6632
The government or related to inspections	Ethics & Compliance Department or Law Department(s)	1-800-8ETHICS or 469-893-6632

Social Media

Separate personal and business social media activity.

Social media is a powerful tool. When used appropriately, social media can promote individual and public health, as well as our facilities and services.

When used inappropriately, it can violate patient privacy leading to significant damage to the Company through:

- Reputational harm
- Loss of patient trust
- Substantial fines and penalties

We have a responsibility to use our mobile devices and applications in accordance with the Company's social media policy. This means we do not use our personal devices to take pictures of patients or patient information. We never post patient information or photographs to a website, social media page, or public forum—even if the patient is not identifiable.

We also never speak on behalf of the Company via social media unless specifically authorized as a Company contributor within the Corporate Communication team.

Consider the following when posting on social media:

- State the materials and opinions you are posting are yours and not the Company's
- Take every precaution to ensure that you are not disclosing any confidential information about the Company
- Refrain from using any Company logos or trademarks without written permission

For questions about social media use, contact Social Media & Service Recovery, a division of the Corporate Communications Department, by emailing socialmedia@tenethealth.com.



Q:

My LinkedIn profile describes me as a Company employee. Should I be mindful of things I "like", comment on, or share?

A:

Yes. We respect the rights of our employees to have personal lives and personal interests. However, as Company representatives, we have a responsibility to use social media respectfully and in accordance with our Company values.

Intellectual Property

Always use our trademarks and other assets properly.

Our intellectual property is a valuable asset that we must always protect.

You should never allow a third party to use our trademarks or other intellectual property without proper authorization and a license agreement approved by the Law Department.

Furthermore, our trademarks should never be used in a degrading, defamatory, or otherwise offensive manner. As an employee, any work you create, in whole or in part, relating to your duties, and/or using Company time, resources, or information, belongs to the Company.

Intellectual property includes our:

- Trademarks
- Brands
- Package designs
- Logos
- Copyrights
- Inventions
- Patents
- Employee work products

Confidential Information

Keeping information secure and confidential is essential to our success.

As part of your job, you may have access to proprietary corporate information or private patient data. This information must be protected to prevent an unauthorized disclosure that could put our Company at risk and potentially violate certain laws. Always take necessary precautions to protect the confidential information you learn or have access to as part of performing your job.

You should not share any confidential information with anyone outside the Company, even to members of your own family, unless the disclosure is:

- Properly authorized
- Relating to a clearly defined, legitimate business need
- Subject to a written confidentiality agreement approved by the Law Department

Even within our Company and among your co-workers, you must only share confidential information on a need-to-know basis. Confidentiality does not impact our ability to report legal violations internally or to the government.

Confidential business information includes:

- Non-public information that could be useful to competitors or harmful to the Company, our patients, our physicians, our vendors, or another third party
- Potentially material information to guide investor decisions in buying or selling securities

Examples of confidential information:

- Earnings/forecasts
- Business plans and strategies
- Significant restructurings or potential acquisitions
- Undisclosed marketing or promotional activity
- Management changes
- Events regarding Company securities

Remember—We must never use or disclose confidential information that violates the privacy rights of our patients.



Q:

We have just hired an employee from a competitor. How much information is he allowed to volunteer about his former employer?

A:

We must not allow the employee to volunteer, nor should we ask for, any proprietary or confidential information about his former employer. Ask yourself if you would be comfortable if a former colleague shared such information with a competitor of ours. Additionally, there are legal implications relating to the disclosure of other companies' confidential information.





Regulatory Excellence

Protect public health through transparency and honesty

Ineligible Persons

We conduct business with high ethical standards.

Our Company does not contract with, employ, or seek payment for services from an individual or entity that is excluded, suspended, debarred, or ineligible to participate in Federal healthcare programs. We routinely search applicable debarment and exclusion lists to ensure this does not happen. Additionally, all employees and the employees of our third-party suppliers are required to report to us if they become excluded, debarred, or ineligible to participate in Federal healthcare programs.

License and Renewals

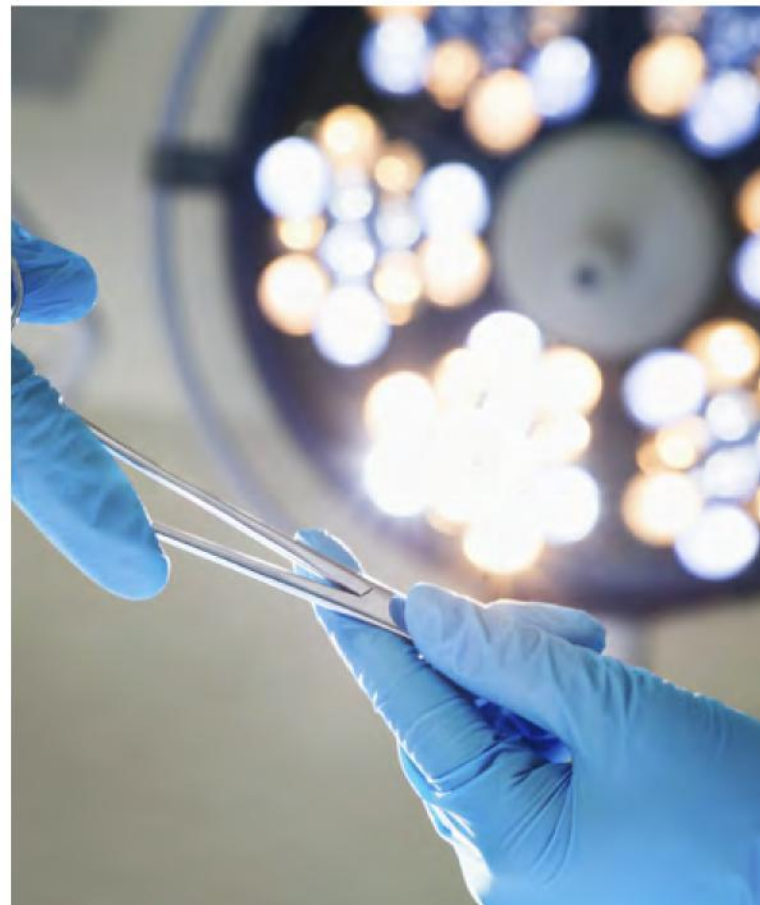
We stay up to date on our licenses and renewals.

Some of us are in positions which require professional licenses, certifications, or other credentials. We maintain the current status of our credentials. It is each colleague's personal responsibility to be able to provide evidence of compliance with federal, state, or local licensing requirements. This could include:

- Licensing
- Certification
- Registration
- Accreditation

Each facility must keep procedures to ensure documentation of compliance with the requirements for each position description.

Remember, we do not do business with individuals or entities that are not in good standing with the government.




Accreditation and External Surveys

We give truthful, non-misleading feedback to external agencies.

Accrediting bodies and external agency entities may request information from us on a variety of topics. These surveys could take place in our facilities or electronically via the completion of questionnaires. Consistent with our core values, we must respond with transparency and honesty. We should not take any action to mislead the accrediting or external agency survey teams.

Anyone aware of suspected violations or misrepresentations to survey agencies must report them immediately to management, Human Resources, the Compliance Officer, or the Ethics Action Line at **1-800-8ETHICS** or ethics@tenethealth.com.



Employees must never conceal, destroy, or alter any documents; lie; or make misleading statements to the agency representative.



Billing and Documentation

We keep accurate and timely medical and billing records.

We have implemented policies, procedures, and systems to bill correctly. These controls meet all federal and state laws and regulations and cover all payers, including government, commercial plans, and patients. We expect our physicians to provide us with complete and accurate information in a timely manner.

In support of correct billing, we must accurately document medical records of the services provided. It is important that all individuals who contribute to medical records provide factual information and do not destroy any information considered part of the official record.

Any subcontractors engaged to perform billing or coding services must have the necessary skills and infrastructure in place to ensure all billings for government and commercial insurance programs are accurate and complete. Our Company expects such entities to have their own ethics and compliance programs, Code of Conduct, and quality control procedures. In addition, any third-party billing supplier must be approved, consistent with our Company's due diligence process.



Q:

What do I do if I see a billing error?

A:

If we see a billing error, we involve a manager, Compliance Officer, or the Ethics Action Line. We investigate and correct the error prior to seeking payment. If we have already billed, we correct the underlying problem and make the proper disclosures and refunds.

Fraud

Conduct business with honesty and openness.

We believe in conducting business transparently. It is one of our core values and we embrace a culture where we feel confident sharing results and outcomes. It is also our responsibility to conduct business in the Company's best interest and in accordance with the highest ethical standards.

In addition to violating our values and this Code, it is considered fraud when you intentionally conceal, alter, falsify, or omit information for your own benefit or the benefit of others. You should avoid even the appearance of fraud in your business transactions. For example, never spend Company funds without proper approval or enter into an agreement on behalf of the Company unless authorized to do so.

Examples of fraud include:

- Presenting false medical information to obtain benefits
- Falsely reporting hours to earn more pay or to avoid discipline
- Requesting expense reimbursement from the Company for personal items
- Misrepresenting or misstating financial information in our books or records

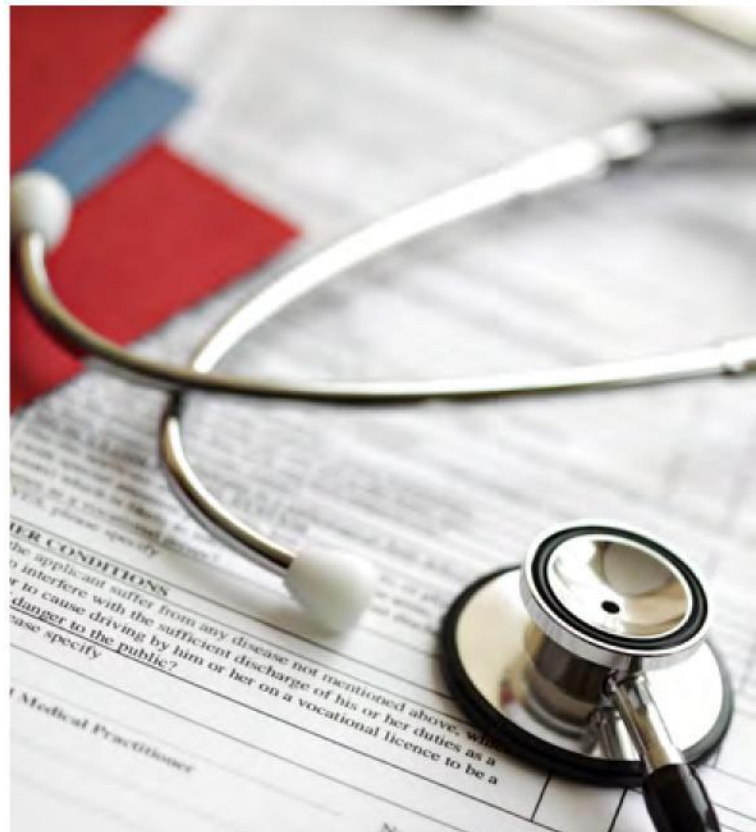


Q:

What is the harm in using a slightly different billing code to ensure the patient receives the necessary treatment?

A:

Accurate records are crucial to our business. Falsely coding medical records puts yourself, the patient, and our entire Company at risk of violating federal laws.



Government Investigations and Requests for Information

Never obstruct a government investigation.

Our Company will cooperate with reasonable government requests for information or facility visits. If a government authority contacts you with a non-routine request, you must notify the Compliance Officer and the Law Department at once. Ultimately, the Compliance Officer and the Law Department will decide what information to provide the government agency or investigators. The fact that a law enforcement agent asks for information does not mean the Company committed a crime. Depending upon the nature of the request, the Law Department may need to balance other concerns such as the privacy rights of our patients and employees or the right of the Company to defend itself from alleged wrongdoing.

Remember, when speaking with a government official, always tell the truth. Lying to a local, state or federal official can be a crime. Never obstruct or interfere with a government investigation and consult with the Compliance or Law Department, if unclear of what steps to take.

False Claims Act and Deficit Reduction Act

We speak up if we see an error or potential false claim.

The Federal False Claims Act and Deficit Reduction Act protect government programs including Medicare, Medicaid, and TRICARE from fraud and abuse. The Company follows these laws and has policies to detect, report, and prevent waste, fraud, and abuse. We also respect and provide protection for whistleblowers, including anonymous reporting options and non-retaliation policies.

If you see an inaccurate medical record, fix it before it is submitted as a claim. If it has already been submitted, contact management, the Compliance Officer, or the Ethics Action Line.

Financial Incentives, Bribes, and Kickbacks

We do not tolerate bribery as a business practice.

We follow all industry anti-bribery laws, such as those that regulate the relationship between hospitals and physicians or other referral sources who may refer patients to the facilities. The two primary federal laws are the Anti-Kickback Statute and the Stark Law but there are also international, state, and local laws. Potential interactions with physicians or other referral sources covered by the Anti-Kickback Statute or Stark Law include:

- Making payments to physicians or other referral sources for services rendered
- Providing space or services to physicians or other referral sources
- Recruiting physicians to the community
- Arranging for physicians or other referral sources to serve in leadership positions in facilities
- Referring patients to a practice owned by a family member

Federal False Claims Act:
The False Claims Act and other statutes prohibit knowingly or recklessly submitting false claims to the Government or causing others to submit false claims.

Deficit Reduction Act:
Contains a number of provisions intended to bolster Medicaid fraud and abuse enforcement, including the requirement to notify whistleblowers of their rights.

We must structure all arrangements with physicians or other referral sources to ensure compliance with legal requirements and our policies and procedures. Additionally, we need to make sure we are meeting our contractual requirements as even properly structured arrangements can be problematic if not administered correctly.

When doing business internationally, we must follow the Foreign Corrupt Practices Act as well as other applicable anti-bribery and anti-corruption national and local laws in the countries where we are operating. Specifically, we should never bribe foreign government officials, their agent, or their relatives to obtain or retain business.

If you believe that someone has offered or received a bribe or kickback, or provided something of value in exchange for referrals, contact the Ethics Action Line. See the Business Gifts, Entertainment, and Meals section for additional requirements.

Our Company’s overarching principles that govern our interactions with physicians and other referral sources:

Principles	Standards
We do not pay for referrals	<ul style="list-style-type: none"> • Patient referrals are based on medical need and our ability to provide the service • Never offer to pay anyone for patient referrals
We do not make referrals based on financial relationships	<ul style="list-style-type: none"> • Never offer to pay or give something of value to anyone for patient referrals
When doing business internationally, we never bribe government officials, their agents, or their relatives to obtain or retain business	<ul style="list-style-type: none"> • We may not pay or offer to pay a foreign government official, an agent, or relative of the official to influence that official to assist in obtaining or retaining business. • Accurate record and accounts of all transitions of assets must be maintained • We may not knowingly falsify books and record
We do not accept payments for referrals we make	<ul style="list-style-type: none"> • When making referrals, we do not take into account the volume or value of referrals the other provider makes to us • No quid-pro-quo (or this for that) arrangements

Anti-Kickback Statute:
Prohibits offering or paying (or asking for or receiving) anything of value to induce the purchase, order, or recommendation of products eligible for payment by a Federal healthcare program.

Stark Law:
Prohibits a physician from referring business to an entity in which the physician or an immediate family member has a “financial relationship.” It also prohibits the entity from billing Medicare, other payers, or the individual for “designated health services” performed based on a prohibited referral.

Foreign Corrupt Practices Act:
Prohibits individuals and businesses from bribing foreign government officials in order to obtain or retain business, imposes record keeping and internal control requirements, and prohibits individuals and companies from knowingly falsifying books and records.

Fair Competition

We compete fairly.

Being innovative means that we do not need to compete against others unfairly. We do not seek to gain an edge through unfair competition. We comply with all antitrust laws and never make agreements with competitors that create monopolies or stifle competition. We do not illegally obtain or use proprietary information from competitors, nor do we use deceptive means to gain such information.



Ethics and Compliance Support

Integrity

The Code of Conduct cannot cover every scenario.

Of course, no Code can anticipate every situation you might encounter at work. It is up to each of us to ask for help if we find ourselves questioning whether a certain situation or issue is consistent with our values, Code, and policies. Too often, it is easy to assume someone else has the same questions as we do, but it is a personal responsibility each of us has to speak up. This means consulting with management, Human Resources, the Ethics and Compliance Department, or the Ethics Action Line.

If you are unclear about something, reach out and let us help. We will thoroughly review your concerns and take decisive steps to correct any problems. We will never approve or condone unethical or illegal behavior.

When you are faced with a gray area of integrity, consider the following:

- How does this decision impact our Company both internally and externally?
- Am I confident this decision is something for which I am willing to be held accountable?
- Is this decision consistent with our Code of Conduct?

