



COMPLIANCE CODE OF ETHICS AND BUSINESS CONDUCT

NOTE: AMG’s Compliance and Ethics Program was designed to help ensure that AMG and all AMG Affiliates conduct AMG business in compliance with all applicable federal and state laws. This Program shall also assist AMG in the reduction of the various risks of misconduct. Internal controls within AMG, this Program, the Compliance Committee and AMG’s specific policies and procedures shall assist, support and encourage the adherence to the requirements of applicable federal and state rules and regulations. AMG shall use this Program and all associated compliance training and education in its advancement of the prevention of fraud, abuse and waste in our healthcare efforts and services and to further our mission in the provision of quality care to our patients. Each individual shall have the responsibility to make themselves aware of and to follow any and all guidelines, policies and procedures that pertain to his or her work duties and responsibilities.

***** ALL AMG affiliates, staff, vendors, contractors, employees, physicians and associates are all bound by and obligated to follow all the provisions of the AMG’s Code of Ethics and Business Conduct. Failure of any individual to abide by any of the Compliance Ethics or Business Code shall be subject to disciplinary action which includes, but is not limited to termination.**

***** Please note that in this Code all Hospitals, Facilities, and Affiliates shall collectively refer to as “AMG” or “Company”.**

Company’s Compliance Program Vision:

Our compliance and ethics program are intended to demonstrate AMG and AMG affiliate’s commitment of the company, through all levels, to the highest standards of integrity, ethics and compliance. There is a Compliance Committee that over-see the compliance and ethics program.

We have established a reporting procedure for circumstances, in which you believe, or suspect, a violation of this code, laws, regulations or company policies and procedures. Each employee has an individual responsibility for reporting any activity by any employee, physician, subcontractor or vendor that appears to violate any of the following:

- Any law

- Rules and Regulations
- Accreditation Standards
- Standards of Medical Practice
- Federal Healthcare Conditions of Participation
- This Code or any Company Policies or Procedures

Non-retaliation:

An employee shall not be disciplined for reporting what he or she reasonably believes to be a violation of the code, regulation, or any law. If any individual has reported any incident to their appropriate supervisor and feels unsatisfied, that individual may contact a member of the compliance committee. Please see the policy on reporting and non-retaliation.

Mission:

An unyielding commitment to Patients, People and the Pursuit of Healing.

Vision:

Aim for Excellence

Make a Difference

Grow Relationships

Values:

Integrity

Inspiring trust through one's moral and ethical standards by having the courage to do what is right.

Standards of behavior:

- Communicate honestly with confidentiality
- Follow through with commitments
- Treat others the way you want to be treated
- Be responsible for one's actions

Community

Connecting people and enhancing relationships.

Standards of behavior:

- Create an environment that makes people feel welcomed
- Come together to support and serve
- Promote volunteerism
- Respect cultural differences

Compassion

By walking in the shoes of others, we can meet their emotional and physical needs.

Standards of behavior:

- Respond to needs in an effective and timely manner
- Be caring
- Treat others with dignity and respect

Excellence

Always striving to be extraordinary.

Standards of behavior:

- Lead by example
- Be a good steward of resources
- Maintain high ethical standards
- Be a progressive organization
- Ensure delivery of safe, quality care

Standards of Behavior

All AMG affiliates are bound by all provisions of this Code, particularly those relating to ethical conduct, conflicts of interest, compliance with law, and internal reporting of violations of the Code. The Compliance Committee Members and the Board shall determine appropriate actions to be taken in the event of violations of the Code by any individual. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code. In determining what action is appropriate in a particular case, the committee shall take into account all relevant information, including:

- the nature and severity of the violation
- whether the violation appears to have been intentional or inadvertent
- whether the individual in question had been advised prior to the violation as to the proper course of action
- whether or not the individual in question had committed other violations in the past

Any amendment to the Code must be approved by the Compliance Committee.

Diversity/Equal Employment Opportunity:

AMG promotes diversity in our work force at all levels of the company. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We make ourselves accountable to one another for the manner in which we treat one another and for the manner in which people around us are treated. We believe the fair and equitable treatment of employees, patients, customers, affiliates, associates, suppliers and other persons is critical to fulfilling our visions and goals. It is our policy to conduct our business and to recruit, hire, train, promote, assign, and transfer, layoff, recall and terminate employees without regard to race, color, religion, gender, national origin, sexual orientation or disability of such person, veteran status or any other classification protected by applicable law. Everyone must report allegations of harassment or discrimination immediately to their supervisor and the HR department. Reported allegations of harassment and discrimination will be investigated in accordance with applicable laws and human resources policies.

Harassment and Workplace Violence:

Everyone at AMG has the right to work in an environment free of harassment and disruptive behavior. Any and all harassment is prohibited at AMG on the basis of age, race, color, gender, national origin, religion, disability, sexual orientation, veteran status or any other characteristic or class protected by the law. We do not tolerate conduct that disrupts our work environment, including behavior that is disrespectful, hostile, violent, intimidating, threatening or harassing. Sexual Harassment is strictly prohibited. Employees who observe or experience any form of harassment or violence should report the incident to their supervisor, the human resources department or call the hotline. All AMG employees and associates should refer to their AMG Handbooks for additional policies and procedures.

Controlled Substances:

The health and safety of our patients are our primary concerns. We follow health and safety policies and regulations that apply to our work, which induce following procedures for handling and disposing of hazardous materials. Hazardous materials safety policies and regulations can be located in AMG's associated policies and procedures. Some of our associates and employees routinely have access to prescription drugs, controlled substances and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorized individuals to minimize risks to us and to patients. If one becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs at AMG, the incident must be reported immediately. AMG has a zero-tolerance policy regarding the possession, distribution or consumption of illegal drugs and alcohol. **Please refer to the AMG's "Employee Handbook" for all policies and procedures regarding this matter.**

Substance Abuse, Drugs, Alcohol, and Smoking:

It is the policy of AMG to maintain a work place that is free from the effects of drug and alcohol abuse. All employees, associates, contractors and affiliates of AMG are prohibited from the use, sale, dispensing, distribution, possession or manufacturing of illegal drugs and narcotics or alcoholic beverages on AMG premises or work site. AMG will not hire or engage individuals whose current use of such substances prevent them from performing their jobs or who would constitute a direct threat to the property or safety of others. Applicants maybe suggested to drug and alcohol tests and screens. Individuals violating these requirements and restrictions will be subject to disciplinary actions including, but not limited to termination. AMG does have a Smoking & Tobacco-Free Policy. **Please refer to the AMG "Employee Handbook" for additional information regarding the rules and regulations on "Drugs, Narcotics and Alcohol" and "Smoking and Tobacco-Free Environment".**

Training:

Upon hire each employee shall be required to read the employee handbook and any applicable training required and confirms that he or she has completed this training, has read and understands all the policies and procedures. An annual training in the areas of compliance will be required of all our employees and contract workers. Compliance personnel will track employees' compliance with their training requirements and report such information as necessary. Any AMG employees or staff not fulfilling their Compliance Training Obligations shall be subject to disciplinary actions, including but not limited to termination.

License and Certification Renewals:

Employees, individuals retained as independent contractors and practitioners in positions that require professional licenses, certification or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. To assure compliance, we may require evidence of a current license or credential status.

Respect for the Individual:

We all deserve to work in an environment where we are treated with dignity and respect. AMG is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

AMG is an equal opportunity employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Create a Culture of Open and Honest Communication:

At AMG everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

AMG will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith. **For addition information please see AMG's *Anti-Retaliation policy*.**

Employees are encouraged, in the first instance, to address such issues with their managers or the HR Representative, as most problems can be resolved swiftly. If for any reason that is not possible

or if an employee is not comfortable raising the issue with his or her manager or HR, AMG's Corporate Office does operate with an open-door policy.

Internal Investigations and Discipline:

AMG is committed to investigating all reported concerns promptly and confidentially to the fullest extent possible. AMG expects all employees and affiliates to cooperate with investigation efforts. Reports of possible violations of the Code will be collected, reviewed, investigated and processed by a member of the Compliance Committee or another appropriate party as designated by the Compliance Committee. Any employee, officer, director, affiliate or other associate believed to have participated in a possible violation shall not be permitted to participate in any investigation or recommendation for disciplinary actions or sanctions.

If a violation of this code is substantiated, disciplinary action will be taken. The precise discipline utilized will depend on the nature, severity and frequency of the violation and may result in any or all of the following disciplinary actions:

- Oral warning
- Written Warning
- Final Written Warning
- Suspension
- Termination; and/or
- Restitution/Penalties

Licensed employees, affiliates or contract workers who violate this code may also be reported to their licensing board for investigation and are at risk of losing their licenses.

Violations of this code that may also constitute illegal conduct may require making a report to civil or criminal authorities for further action.

AMG has a zero-tolerance policy for any purposeful acts of fraud and/or abuse. Any individual violating any aspect of the Code or Program will be disciplined in accordance with our human resource policies and procedures.

Where an internal investigation substantiates a reported violation, it is our policy to initiate corrective action including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary and implementing systemic changes to prevent a similar violation from recurring in the future.

Management Behavior:

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and

demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At AMG, we want the ethics dialogue to become a natural part of daily work.

Uphold the Law:

AMG's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or AMG policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Because of the nature of our business, some legal requirements warrant specific mention here:

- Prevention of fraud, waste and abuse in the federal healthcare program
- Elimination of the improper influence of financial incentive on medical judgment
- Protection of patients and improving the quality of health care.

Fraud and Abuse:

AMG expects its employees and associates to refrain from conduct that may violate federal and state law governing patient referrals, healthcare financial relationships and participation in federal and state healthcare benefit programs. Fraudulent activity may involve material false statements or representations of facts to obtain payment for their benefit. Abuse may be practices that result in unnecessary increased costs or utilization of medical services/products.

False Claims Act:

Under the Federal False Claims Act, any individual or entity that knowingly submits a false or fraudulent claim for payment of United States government funds can be held liable for significant penalties and fines. Potential fines for violating the Act include monetary penalties and potential imprisonment.

Anti-Kickback Law:

The Federal Anti-Kick Law prohibits any person or entity from offering, paying, soliciting or receiving anything of value, directly or indirectly, for the referral of patients covered by Medicare, Medicaid and other federal and state healthcare benefit programs or the leasing, purchasing, ordering or arranging for or recommending the lease, purchase or order of any item, goods, facility or service covered by these programs.

Stark Law:

In general, physicians are prohibited from referring Medicare patients for certain designated health services to an entity with which the physician or member of the physician's immediate family has a financial relationship, unless a specific exception applies. Those in violation of the Stark Law shall be subject to civil monetary fines and penalties.

Can NOT Provide Gifts to Patients/Beneficiaries:

The Civil Monetary Penalties Law prohibits any person or company from offering or giving items or services for free to any Medicare or Medicaid beneficiary. Items that are nominal in value are not prohibited by this statute; however, nominal in value has been interpreted to mean no more than \$10 per item or \$50 in the aggregate on an annual basis. All questions on any gifts no matter the value should be brought to the Compliance Committee Members.

Antitrust Law:

Prohibits the making or entering into agreements or sharing information with competitors regarding (not an all-inclusive list): purchasing costs or terms, competitive bids or quotes, credit information, territorial markets or markets shares, product plans, costs, selling/leasing prices or pricing policies, terms or conditions of sale, customers or account data, marketing strategies, market survey information, profits or profit margins.

Dealing with Government Agencies:

Do not directly or indirectly promise, offer or make payment in money or anything of value to anyone, including a government official, agent or employee of a government, political party, labor organization or business entity of candidate of a political party or their families, with the intent to induce favorable business treatment. It is also inappropriate in certain circumstances to discuss employment possibilities with government employees while doing business with the government.

Anyone aware of violation or suspected violations of laws, regulations, standards and the conditions of participation or company policies and procedures must report them immediately to a supervisor or member of management, a member of the Compliance Committee or the AMG Hotline. **The Hotline (844) 523-2091.**

Competition:

We are dedicated to ethical, fair and vigorous competition. We will sell AMG products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or

gratuities in connection with the purchase of goods or services for AMG or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Confidential Information:

AMG is committed to being conscientious and accountable when handling confidential company information. Confidential Information includes but is not limited to the following: Patient Health Information, Company Financial Information, Written and Verbal Agreements of AMG, Trade Secrets, Due Diligence Information about potential acquisitions or sales, customer lists and agreements, company policies and procedures and processes. In addition, because of its confidential nature, business, health and financial information must be:

- Protected by an effective internal control environment, including policies and procedures to secure the company's assets; and
- Made available outside the company only with appropriate authorization and after consideration of the interests of the company as a whole.

Confidential Information includes all non-public information that might be of use to competitors or harmful to AMG, the Hospital, or our patients if disclosed. All information in any form, including electronic information that is created or used in support of our business activities, is the property of AMG. This information is a valuable asset to AMG, and all individuals are expected to protect it from unauthorized disclosure. This includes our customers, suppliers, business partners and family. Federal and state laws may restrict the use of such information and impose penalties for impermissible use or disclosure. All parties shall take all reasonable efforts to safeguard such confidential information that is in their possession or knowledge against advertently or inadvertently disclosure and shall comply with any non-disclosure obligations imposed on AMG or its agreements with third parties.

Selective Disclosure:

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to AMG, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

Patient Rights:

It is AMG's intent to treat all our patients equally and with compassion, dignity and respect. We make no distinction in the availability of services; in the admission, transfer or discharge of patients; or in the care we provide based on age, gender, disability, race, ethnicity, color, religion, sexual orientation, veteran status or national origin. We recognize and respect the diverse backgrounds and cultures of our patients and make every effort to equip our caregivers with the knowledge and resources to respect each patient's heritage. We respect the patient's right to

and need for effective communication. Additionally, each patient is provided with a Notice of Privacy Practices.

Patient Information/Privacy:

During the course of business and the provision of services, AMG collects patient information, including medical condition, history, medication and family illnesses, to provide quality care. We realize the sensitive nature of this information and are committed to maintain its privacy, security, and confidentiality. Consistent with the Health Insurance Portability and Accountability Act of 1996 and its subsequent amendments, we do not access, use or disclose patient-specific information, including patient financial information, with others unless it is necessary to serve the patient or required by law.

AMG's employees, affiliates, contractors, personnel or any other associated party must never access, use or disclose confidential information that violate the privacy rights of our patients. In accordance with our privacy and security policies and procedures, no individual has a right to any patient information other than that necessary to perform his or her job.

As per our Notices of Privacy Practices, patients can expect their privacy will be protected. Patient information will only be used or disclosed to persons allowed by law (including disaster and emergency situations) and in accordance with any written patient authorization and applicable state or federal law.

Document Retention and Destruction :

Retention:

Legal, Regulatory, and Accrediting Requirements: These policies and practices shall be consistent with the relevant state and federal laws and regulations that contain provisions relating to retention of health record data in original and alternate storage medium (microform, magnetic tape, etc.). The requirements of accrediting agencies shall be met, and the guidelines of professional associations shall be followed where practicable and permitted by law or regulation.

Destruction:

Destruction of Records: Destruction of records shall be carried out according to the approved record retention schedule of the facility. This shall be carried out under the direct supervision of the Senior VP of Regulatory Compliance and Reimbursement, or designee with adherence to HIPAA guidelines.

Please refer to AMG's Retention of Medical Records Policy for additional details and specifics.

Coding and Billing:

AMG has implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers and patients. These policies, procedures and systems conform to pertinent federal and state laws and regulations. AMG prohibits any employees or agent of AMG from knowingly presenting, or causing to be presented, claims for payment or approvals that are false, fictitious or fraudulent. In support of accurate billing, medical records must provide reliable documentation of the services we render. It is important that all individuals who contribute to medical records provide accurate information and do not destroy any information considered part of the official medical record. Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients in our facilities. We expect those physicians to provide us with complete and accurate information in a timely manner. We only bill for services that are medically necessary and properly ordered and performed. Any subcontractors engaged to perform billing or coding services are expected to have the necessary skills, quality control processes, systems and appropriate procedures to ensure all billings for government and commercial insurance programs are accurate and complete. We expect such entities to have their own ethics and compliance programs and code of conduct and to agree to abide by ours.

Health and Safety:

AMG is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see your HR department.

Conflicts of Interest:

All directors, officers, employees, affiliates and associates of AMG owe a duty of undivided and unqualified loyalty to AMG and must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of AMG may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for AMG. We owe a duty to AMG to advance its legitimate interests when the opportunity to do so arises. We must never use AMG property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with AMG.

Here are some other ways in which conflicts of interest could arise:

- Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with or associated with AMG.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for an outside commercial company or organization.

- Owning or having a substantial interest in a competitor, supplier or contractor.
- Having a personal interest, financial interest or potential gain in any AMG transaction.
- Placing company business with a firm owned or controlled by an AMG employee or his or her family.
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all AMG employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department. Everyone should avoid any and all appearance of unethical practices.

Gifts, Gratuities and Business Courtesies:

AMG is committed to competing solely on a merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by AMG was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom AMG does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of AMG or customers, or would cause embarrassment or reflect negatively on AMG's reputation. Should you receive a gift, gratuity or business courtesies for any reason, it shall not become your personal property, but that of AMG and should be reported to the Compliance Committee for determination.

Accepting Business Courtesies:

Most business courtesies (including, but not limited to gifts, meals and entertainment) offered to us in the course of our employment are offered because of our positions at AMG. We should not feel any entitlement to accept and keep a business courtesy. Employees or associates who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when AMG is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain AMG business. Should you receive a gift, gratuity or business courtesies for any reason, it shall not become your personal property, but that of AMG and should be reported to the Compliance Committee for determination.

Meals, Refreshments and Entertainment:

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

Offering Business Courtesies:

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon AMG. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our associates. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of AMG and set metrics and report results accurately.

Corporate Recordkeeping:

We create, retain and dispose of our company records as part of our normal course of business in compliance with all AMG's policies and guidelines, as well as all regulatory and legal requirements. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with AMG's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of AMG books, records, processes or internal controls.

Promote Substance Over Form:

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away. At AMG, we must have the courage to tackle the tough decisions and make difficult choices; secure in the knowledge that AMG is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although AMG's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability:

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

AMG takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Confidential and Proprietary Information:

Integral to AMG's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources:

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent AMG are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours without prior approval.

In order to protect the interests of the AMG network and our fellow employees, AMG reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or AMG's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Use of AMG's Property or Software:

To establish and document compliance with HIPAA Privacy and Security Rule requirements in regards to workstation use and security and to further establish acceptable use standards regarding the Hospital's information systems and data to avoid exposure caused by inappropriate use to various risks including: hacking attacks; compromise of network systems and services; and legal violations.

This policy applies to all members of this Hospital's workforce and includes information systems and data owned or leased by this Hospital, or are otherwise connected to, stored on, or accessed by our computer systems or computer networks. This Hospital is committed to protecting itself, our users, and business partners from damaging or illegal actions caused by users of our information systems and data. Workstations that store or provide access to electronic protected health information or sensitive financial information are used and safeguarded in a manner that maximizes security and prevents unauthorized access. It is the responsibility of every user to read and understand this policy and to conduct their activities accordingly.

All users shall follow all Privacy and Security P&P's which are designed in whole to:

- Specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected information; and,
- Establish physical safeguards for all workstations that access electronic protected information, restricting access to authorized users.

General Use and Operations:

All information systems are intended for business purposes only. The Chief Information Officer (CIO) or appropriate designee must approve all computers, software, systems, networks, and

network connections prior to installation. Maintenance, modifications, uninstalls, and disposal is handled by the Information Technology Department staff or by contractors, consultants, vendors or other third parties that have been approved by the CIO or designee.

All users' e-mail and the Internet use must not interfere with the timely completion of work assignments, cause the depletion of computer supplies, cause degradation to the performance of the network, damage computer equipment, or otherwise violate Hospital policies.

Information systems hardware, software, and data may not be removed from Hospital premises unless such activity is due to a legitimate business need and is specifically authorized by the CIO or designee. This restriction does not apply to portable computing devices such as laptop computers and PDA's that have been previously authorized by the CIO. **Please refer to AMG's "Acceptable Use" policy for additional policies and procedures.**

Workstation Security Controls:

AMG has established rules for securing workstations that access ePHI. Since ePHI can be portable, this policy requires workforce members to protect ePHI at the Hospital and all other locations. AMG has implemented safeguards to prevent unauthorized access of ePHI through workstations and to protect ePHI from any intentional or unintentional use and disclosure. **Please refer to AMG's "Workstation Security" Policy for additional policies and procedures.**

Media Inquiries:

AMG is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the AMG Senior Vice President of Hospital Operations. No one may issue a press release without first consulting with the AMG Senior Vice President of Hospital Operations. See Policy specifically regarding this matter.

Do the Right Thing

- Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:
- Does what I am doing comply with the AMG's guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?

- Is this the right thing to do?

Information and Resources:

All of the Following individual may be contacted at the information as set forth below: President; Chief Executive Officer; Chief Financial Officer & Senior VP of Corporate Operations; Chief Operating Officer; Senior VP of Hospital Operations; Senior VP of Regulatory Compliance and Reimbursement; Director of Patient Financial Services; Director of Human Resources; Director of Payroll; Chief Information Officer & HIPAA Security Officer; In- House Counsel; Chief Compliance Officer; Chief Nursing Officer; Director of Supply Chain Management.

AMG Corporate Address: 101 La Rue France, Suite 100
Lafayette, LA 70508

AMG Corporate Telephone #: (337) 269-9566

AMG Corporate Fax #: (337) 269-6082

AMG Corporate Compliance Hotline: Toll-Free (844)523-2091

Email: An email may be sent to the corporate officers by going to AMG's homepage <http://www.amgihm.com> and clicking on the "Contact Us" link.

Code of Ethics and Business Conduct Statement of Acknowledgement

1. I, _____, (Print Full Name) do hereby expressly confirm that I have received, read and understand the Code of Ethics and Business Conduct of Acadiana Management Group and Affiliates (AMG);
2. I understand that my full compliance with the AMG's Code of Ethics and Business Conduct is a mandatory condition of my employment, association or affiliation with AMG; and
3. I understand that if I fail to abide by any of the AMG Compliance Ethics and Business Code, I shall be subject to disciplinary action which includes, but is not limited to termination.

Applicant, Employee, Associates or Affiliate's Name

(Print): _____

Applicant, Employee, Associates or Affiliate's Signature: _____

Date: _____

Facility or Company Name:

HR Witness/Supervisor Signature: _____

Date: _____

Witness Printed Name & Title:
