Code of Conduct

A18

The Code of Conduct provides standards of conduct to protect and promote integrity and to enhance Gillette's ability to achieve its mission. We expect all officers, employees, Board members, members of Gillette's medical staff, independent contractors, consultants, volunteers and other representatives of Gillette (collectively, "Gillette Representatives") to adhere to the highest standards of conduct. Violations of legal or ethical requirements jeopardize the welfare of Gillette, our Gillette Representatives, our patients, and the communities served by Gillette.

COMMITMENT TO ETHICS AND COMPLIANCE

The Code of Conduct (the "Code") is an essential part of Gillette's Corporate Compliance Program. Specifically, the Chief Executive Officer (CEO) in conjunction with the Compliance Officer, shall have the authority to take necessary actions to foster compliance with governmental laws and regulations. These actions include, but are not limited to:

- Enabling the members of the Board of Directors (the "Board") to exercise their duties of care, obedience and loyalty in their decision making and oversight activities, by helping to ensure the flow and forthright disclosure of information to the Board;
- Helping to ensure accurate financial reporting, including oversight of the independent auditors contracted by Gillette, and the overall integrity of the financial reporting process;
- Helping to ensure compliance with fraud and abuse laws when Gillette transacts business with referral sources; and
- Helping to ensure accurate billing for patient care services.

In turn, Gillette Representatives have the responsibility to bring any situations that appear not to comply with the Code of Conduct to the attention of their respective supervisors or the Compliance Officer. Adherence to the Code promotes an overall atmosphere of ethical and honest behavior in the performance of our job duties.

The Code is not intended to replace, but rather supplement and support, compliance with governmental laws, rules, and regulations, as well as other Gillette policies and procedures, as may be amended from time to time. The Code provides guidance on how to resolve questions regarding legal and ethical issues and establishes a mechanism for reporting possible violations of law or ethical principles within Gillette.

Patient Care Services
Gillette's activities encompass, without limitation, patient care services such as the prevention and treatment of illness, as well as education and research. All such activities will be conducted with integrity, compassion, and a concern for human welfare and dignity. Gillette Representatives are expected to make a good faith effort to meet or exceed a standard of exceptional service in a courteous manner. It is expected that every individual coming into contact with Gillette, whether patient, visitor, employee, practitioner, student, or volunteer, will be able to enjoy an atmosphere that fosters respect, personal safety and courtesy. *[PC21] Plan for the Provision of Patient Care*

Provision of Quality Care
Gillette Representatives shall follow standards of care based upon the identified needs of the patient without regard to ability to pay. Gillette Representatives shall seek to avoid the provision of services that are medically unnecessary or ineffective. Every reasonable effort should be made to provide high quality health care to patients in an economical manner. *[PC21] Plan for the Provision of Patient Care*

Patients' Rights
Gillette Representatives shall comply with applicable state and federal laws regarding patients' rights. Gillette Representatives shall respect patients' rights and assist patients and/or their legally authorized representatives in understanding and exercising their rights and responsibilities. *[A07] Patient's Rights and Responsibilities*

Patient Non-Discrimination and Accommodation of Special Patient Needs
Gillette acknowledges and respects individual patient differences, such as personal background, race, color, ethnic or cultural heritage, national origin, religious/spiritual views, communication needs, sex, age, marital status, veteran status, sexual orientation, gender identity, handicap, and developmental disability. All patients should be able to expect a high quality of care based on their unique health care needs, with respect for and regardless of, individual differences. Gillette recognizes its responsibility to accommodate the special needs of patients and Gillette Representatives with disabilities. Gillette will make every reasonable effort to comply with local, state and federal laws, rules and regulations that apply to such circumstances. These accommodations will be made in a manner that attempts to respect the dignity of all parties involved. *[PC07] Non-Discrimination*

Patient Care Ethics Committee Consultation
Gillette recognizes differences of opinion among those who participate in patient care decisions. Gillette will seek to resolve conflicts fairly and objectively through committee consultation. *[A02] Ethics Resources*

Patient Admission, Transfer, and Discharge
Patient admission, transfer and discharge shall be properly conducted in an ethical manner and in accordance with applicable local, state and federal laws, rules and regulations. In an emergency situation, financial and demographic information will be obtained after the immediate needs of the patient are met. Patients whose specific condition or disease cannot be safely treated in Gillette shall be properly transferred to an accepting facility. A patient will be transferred to another facility only if his or her medical needs cannot be met and appropriate care is readily available at another facility. The patient may request a transfer to another facility. Such a request will be facilitated when medically appropriate and legally permissible. [CC0004] *Pediatric Intensive Care Admission, Transfer & Discharge Criteria*

Privacy of Patient Information
To provide the best care possible, Gillette collects health information about our patients, including information related to their medical condition, health history, medications, and family illnesses. It is also necessary to collect certain demographic, financial and insurance information to ensure that the proper parties are billed for the care provided. We recognize the sensitive nature of this information and are committed to maintaining its confidentiality. *[C3.2] Confidentiality of Patient Health Information*

Diversity and Equal Opportunity Employment

Gillette is committed to equal employment opportunity in the work place. Gillette seeks a working environment free of discrimination on the grounds of race, color, religion, sex, age, disability, national origin or any other illegal factor. As is consistent with the high regard Gillette places upon employee satisfaction and respect, Gillette is committed to abiding by federal, state and local laws, rules and regulations dealing with employment matters. *[HR-E06] Equal Employment Opportunity and Affirmative Action*

Gillette Representative Relief from Participating in Patient Care

Gillette acknowledges that a Gillette Representative may request to be relieved from participating in a particular patient's care or treatment in a situation where the prescribed care or treatment presents a conflict with deeply held cultural values, ethical principles or religious beliefs. Gillette shall help ensure that patient care and treatment are not compromised if such a request is granted. *[PC 20] Staff Members Request to not Participate in an Aspect of Patient Care*

Harassment and Workplace Violence

Gillette is committed to providing a work environment that is free from all forms of discrimination and/or conduct that can be considered harassing, coercive, disruptive or illegal. Actions, works, jokes or comments based upon an individual's race, color, religion, sex, national origin, ancestry, age, sexual orientation, disability, military or veteran status or any other characteristic protected by law will not be tolerated. Gillette Representatives have a duty to report unlawful harassment or violence of themselves or others. The incident should be reported in accordance with Gillette policies, including without limitation to Gillette Representative's supervisor, the Human Resources Department, a member of management or the Compliance Officer. *[Policy HR-M04] Harassment and Bullying*

Drug-Free Workplace

Gillette believes that a safe working environment requires that Gillette Representatives be unimpaired by drug and alcohol use. Possession or consumption of alcohol is prohibited while on Gillette premises, except in designated areas when consumption has been authorized in advance, and then only in moderation. *[HR-M03] Drug/Alcohol Testing*

Workplace Health and Safety

Gillette is committed to providing a safe and healthy environment for patients, Gillette Representatives and visitors. Gillette has implemented policies and procedures designed to protect Gillette Representatives from potential workplace hazards and help ensure compliance with occupational health and safety laws and regulations and environmental laws and regulations relating to the organization's operations. Gillette Representatives have a responsibility to become familiar with and understand how these applicable policies and procedures relate to their specific job duties. *[HM01] Comprehensive Waste Management Plan*

Proper Control of Medications

Gillette is legally responsible for the proper handling and distribution of pharmaceutical products. We are responsible for preventing unauthorized access to and misuse of pharmaceutical products. Gillette Representatives may not use medications dispensed by Gillette's Pharmacy for personal use, unless prescribed in accordance with Gillette policies and procedures. The unauthorized use of any prescription drug or controlled substance by any Gillette Representative, including drug samples, is strictly prohibited. All Gillette Representatives have a duty to safeguard and help ensure the proper use of prescription drugs and controlled substances maintained by Gillette in accordance with applicable laws, rules, regulations and Gillette policies and procedures.

Use of Resources It is the responsibility of each Gillette Representative to help preserve Gillette's assets, including time, materials, supplies, equipment and information. Gillette assets are to be maintained for business and patient care related purposes only.

Financial Matters

Gillette Representatives shall work to maintain the financial records of Gillette in an accurate and complete manner. Gillette accounting controls will be sufficient to provide reasonable assurance that:

• Expenditures are made with proper approval and authorization;

• All transactions are recorded to help Gillette prepare financial statements and account for resources in accordance with established policies;

• Access to assets is permitted only with proper approval;

• Assets are adequately safeguarded, with any discrepancies immediately reported in accordance with Gillette policies, including without limitation to management.

The financial matters of Gillette, its Gillette Representatives and patients are very confidential and private. Gillette Representatives shall not reveal these matters to any outside parties without permission from the Chief Financial Officer or the Chief Executive Officer.

Billing for Services Rendered

Gillette recognizes the imperative nature of accurate and timely billing. Gillette shall strive to help ensure that patients and third parties will be billed only for services actually provided and fully documented in the patient's medical record. *[C2.1] General Billing*

Electronic Media

All communication, electronic mail, Intranet, Internet and voice mail, employed or provided by Gillette are the property of Gillette and are to be primarily used for business purposes. Reasonable personal use of Gillette's communications is permitted; however, such communications are not private. Gillette reserves the right to periodically access, monitor and disclose, without notice, the contents of any e-mail or voice mail message. As a general rule, patient or other confidential information will not be disclosed through the Internet, unless Gillette management authorizes such disclosure or as may otherwise be permitted by applicable Gillette policies and procedures. *[IS01] Information Security Policy, [IS03] Acceptable Use Policy*

Gifts and Gratuities

Gillette Representatives should not accept money, gifts, services, entertainment or other things of value which may influence your actions relating to Gillette. Gillette has policies on gifts and gratuities and vendor interaction that should be followed. Questions pertaining to the appropriateness of a gift should be directed to a Gillette Representative's supervisor and/or Gillette's Compliance Officer. *[A27] Conflict of Interest*

Conflicts of Interest

To ensure the continued confidence of the communities served by Gillette, Gillette Representatives shall act in a manner consistent with their responsibilities to Gillette and may not use their positions to profit personally at the expense of the organization, financially or otherwise. Potential conflicts of interest should be directed to the Compliance Officer. *[A27] Conflict of Interest*

Political Activities

Gillette will not participate in or intervene in, directly or indirectly, any political campaign on behalf of (or in opposition to) any candidate for elective public office. However, Gillette Representatives may give their own money to political candidates and participate in political campaign activities on their own time.

Accuracy, Retention and Disposal of Records

Every Gillette Representative is responsible for the integrity and accuracy of Gillette's records. Records must not only comply with regulatory and legal requirements, but should also support our business practices and actions. Alteration or falsification of information on any record or document is strictly prohibited. It is important to retain and destroy records appropriately according to Gillette's Records Retention Policy, as may be amended from time to time. If a Gillette Representative believes that documents should be saved beyond the applicable

retention period, he or she should consult the Compliance Officer. *[MR10] Documentation in Medical Records, A13 Organization Record Retention Schedule*

Gillette services will be provided in accordance with applicable federal, state and local laws, rules and regulations. Such laws, rules and regulations relate to subjects such as licenses, permits, accreditation standards, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, patient rights, Medical Staff membership and clinical privileges, and Medicare and Medicaid requirements. All Gillette Representatives have a responsibility to know about and to comply with laws, rules and regulations affecting their job duties. Gillette Representatives should immediately report violations or suspected violations of any law, rule or regulation in accordance with Gillette policies, including without limitation to a supervisor, member of management or the Compliance Officer.

Accrediting Bodies

It is Gillette's intention and goal to interact with all accrediting bodies in a direct, open and honest manner. No action will intentionally be taken in our dealings with accrediting bodies that would mislead an accreditor or its survey team, either directly or indirectly.

Medicare/Medicaid Fraud and Abuse

Facilities that receive monies for items or services provided under the Medicare and Medicaid programs are subject to several laws, rules and regulations designed to prevent fraud and abuse. These laws were created to make certain that federal funds, which finance the Medicare and Medicaid programs, are used only for those purposes. Failure to obey these laws, rules and regulations can result in fines, jail and/or exclusion. *[C2.1] General Billing*

Anti-Kickback/Bribes

Gillette Representatives are prohibited from offering, paying, asking for, or accepting any money or other benefit in exchange for patient referrals, purchases, leases or orders. All contracts and other referral sources are to follow all applicable laws.

Screening of Excluded Individuals

Gillette will not knowingly employ or contract with individuals or entities that have been listed as debarred, excluded or otherwise ineligible for participation in Federal health care programs. *[HR-E02] Background Investigations*

Research

Any research is conducted following high ethical standards and all laws and regulations. Research directly involving patients require review and approval by an Institutional Review Board (IRB) and informed consent of each participant. Accurate Records are maintained of the research project, results, and costs.

Antitrust

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Discussing Gillette business with a competitor could violate antitrust laws. Accordingly, Gillette Representatives should not engage in discussions or agreements with competitors to establish, fix or control prices; to allocate or apportion service lines, markets, territories or patients; to boycott certain payors or suppliers; to disclose confidential bid information; or to engage in practices that are deceptive or otherwise unfair. Gillette Representatives should not obtain proprietary or confidential information about a competitor through illegal or unethical means. Gillette Representatives should not seek proprietary or confidential information when doing so would require anyone to violate a contractual agreement, such as a confidentiality agreement.

Copyright & Intellectual Property Laws

Consistent with the high value Gillette places upon proprietary information, Gillette ledges to comply with applicable federal, state and local laws, rules and regulations that protect intellectual property. Intellectual property includes, without limitation, patents, trademarks,

service marks, trade secrets, and copyrights. During the course of employment, a Gillette Representative may have access to intellectual property owned by other businesses. This information may include, without limitation, patents, techniques, publications or trade secrets. This information is confidential and should not be disclosed to others or used for personal purposes.

Underlying each of the above statements is Gillette's overall commitment to act with integrity in all its activities and to treat Gillette Representatives, patients, physicians, students, and the many other constituents served by Gillette with utmost respect. Supporting policies and procedures, as may be amended from time to time, shall be set forth in Gillette Policy and/or Department Policy Manuals and are available to Gillette Representatives upon request. Please review specific policies and/or procedures for additional guidance.

Questions Regarding the Code

The Compliance Officer is responsible for assisting in the implementation of Gillette's Corporate Compliance Program, including this Code. The Compliance Officer will work with members of management, as necessary, to implement this Code, which shall include training of Gillette Representatives and enforcement of the Code. Any Gillette Representative who has a question regarding the applicability or interpretation of this Code should direct the question to the Compliance Officer in person, in writing, or by telephone.

Reporting of Suspected Violations

Gillette Representatives must report suspected violations of this Code. Reporting enables Gillette to investigate potential problems quickly and to take prompt action to deal with them. As a matter of policy, Gillette Representatives will not be disciplined or subjected to retaliatory action as a result of making a report in good faith. Whenever possible, the confidentiality of Gillette Representative making the report will be protected.

Reports of possible violations of this Code, or of any law or ethical standard should be made in accordance with Gillette policies, which may include without limitation reports to Gillette Representative's supervisor. If the report is made to the supervisor, the supervisor will report the suspected violation in accordance with Gillette policies, including without limitation to the Compliance Officer. Gillette Representative may also report directly to the Compliance Officer. A Gillette Representative need not be absolutely certain that a violation has occurred before making such a report; rather, reasonable belief that a violation may have occurred is sufficient. Gillette Representatives have a responsibility to come forward with any such information, without regard to the identity or position of the suspected offender. Retaliation is prohibited by law when concerns are reported in good faith.

Acknowledgment and Certification of Compliance

Gillette requires that all Gillette Representatives sign an Acknowledgement confirming that they:

(i) have received and read the Code;
(ii) understand the Code and their own duty to comply with the Code; and
(iii) have been given an opportunity to ask questions regarding the Code.

ACKNOWLEDGMENT

I acknowledge and confirm that I have received a copy of the Code of Conduct (the "Code"). I further acknowledge that I have read the Code and have had an opportunity to ask questions regarding the Code and what is expected of me. I agree to conduct myself, as an employee, Medical Staff member, volunteer, agent, consultant or other representative of Gillette in accordance with the Code. I also agree that I have a duty to report any suspected violations of the Code.

Name: (Please Print) _____

Department: _____

Signature: _____

Date: _____

Please return this page to the Human Resources Department

Thank you