

**COMPLIANCE**

**ETHICS**

**INTEGRITY**

**MED3000**

**CODE OF CONDUCT SUMMARY**

JANUARY 2009

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## I. THE COMPANY'S COMPLIANCE AND ETHICS PROGRAM STRUCTURE

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The MED3000 Code of Conduct serves as a framework for how MED3000 conducts business. The Compliance and Ethics Program is intended to demonstrate the commitment of the organization to the highest standards of compliance and ethics. The elements of the program include setting standards, communicating the standards, providing a mechanism for reporting potential exceptions, monitoring and auditing, and maintaining an organizational structure with which all employees shall comply. It is the responsibility of every employee of MED3000 to understand and follow the specific standards that govern business conduct. Deviation from the compliance standards and business ethics or from federal, state, or local laws and regulations as outlined in the MED3000 Code of Conduct **will not be tolerated**.

The Chief Compliance and Ethics Officer (CCO), the Chief Executive Officer (CEO), and the Compliance Committee are responsible for the day-to-day direction and implementation of the Compliance and Ethics Program. This includes developing resources for, and providing support to, Compliance Liaisons. Compliance Liaisons are responsible for administering the Compliance and Ethics Program in their facilities.

Some of the issues arising out of the Code of Conduct may be addressed by HR. HR is highly knowledgeable about the risk areas pertaining to employment. Every effort should be made to resolve workplace conduct and employment practice issues through the local HR Manager and MED3000 leadership.

### **Resources for Guidance and Reporting Concerns**

The Code of Conduct is intended to serve as a guide to resolve compliance and ethics issues by providing the information, tools and resources necessary to make appropriate decisions. For guidance on reporting compliance concerns, employees should contact their manager, the Compliance and Ethics Office, or call the Compliance Hotline at: **1-866-294-7825**. MED3000 employees may also go to the Compliance and Ethics web page on the MED3000 intranet for a full copy of the Code of Conduct and Compliance Plan.

MED3000 makes every effort to maintain, within the limits of the law, the confidentiality of the identity of an individual who reports concerns or potential misconduct, whenever possible. MED3000 prohibits retaliation against any individual who reports a concern in good faith. However, any employee who deliberately makes a false accusation with the purpose of harming or retaliating against another employee or the company will be subject to disciplinary action.

Suspected and actual violations of this Code of Conduct and the accompanying policies must be reported to the CCO. Additionally, if retaliation is thought to be occurring, it should be reported immediately to the CCO. If any employee does not report violations, that individual is subject to disciplinary action, up to and including termination.

MED3000 is committed to ethical and legal conduct that is compliant with all applicable laws and regulations and to correcting wrongdoing wherever it may occur within the organization. Each employee is responsible for reporting any activity that may violate applicable laws, rules, regulations and/or MED3000 policies. If an employee feels that due attention has not been given to the concern, he/she may also report the activity to a governmental agency.

### **Acknowledgement Process**

MED3000 requires employees to sign an acknowledgement form confirming that they have received the Code of Conduct, understand it represents mandatory policies, and agree to abide by it.

**Failure to comply with the standards established by this Code of Conduct may subject individuals to disciplinary action if they authorize or participate, directly or indirectly, in actions that constitute a violation of the law, the Code of Conduct, or related policies and procedures. Appropriate discipline for violations of the Code of Conduct or applicable laws and regulations will be utilized and will depend on the nature, severity and frequency of the violation and may result in: oral warning, written warning, written reprimand, suspension, termination and/or restitution.**

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## II. INTRODUCTION

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### **Ethics, Mission and Values Statement**

#### **Our Mission**

MED3000 is dedicated to developing and delivering technologies and services that empower providers and employers to improve the delivery of healthcare in the communities they serve.

#### **Our Vision**

Our vision is to be a premier strategic operations partner for healthcare providers and employers.

#### **Our Values/Culture**

MED3000 is committed to maintaining an ethical culture of honesty and integrity with a commitment to quality improvement, which focuses on empowering physicians and clients to reach their highest levels of operational, clinical and financial performance.

We believe our responsibility is to our clients, our shareholders, and our employees. We embrace the relationships we have with them, and in doing so, we will strive to be accountable, caring, communicative, honest, praising and professional.

As a company, we realize that performance isn't the only measure, because at the end of the day, the outcome of the *patient* is what really matters. Our physician partners, the patients, the communities we serve, and our employees deserve nothing less.

#### **Purpose of the Code of Conduct**

The Code of Conduct provides guidance to MED3000 employees, independent contractors and external vendors to reinforce the organization's expectations and to assist the organization in carrying out its daily activities within the appropriate ethical and legal standards.

The Code of Conduct is a critical component of the MED3000 Compliance Plan and has been developed to meet ethical standards as the organization conducts its business in a manner that facilitates quality, efficiency, honesty, integrity, respect and compliance with all applicable federal and state laws and regulations.

#### **Leadership Responsibilities**

MED3000 responsibly manages its business in order to maintain the confidence, respect, and trust of its clients, partners, stakeholders, and others. The organization is committed to acting with integrity, being responsive and accountable while remaining a leader in the field. Employees are required to follow the Code of Conduct and executive leaders are expected to create an environment where employees feel free to propose ideas and raise concerns.

Executive leadership is also expected to assure that employees have the necessary information to comply with all applicable federal and state laws and regulations, as well as to comply with MED3000 policies and procedures and contribute to creating a culture that promotes the highest ethical standards and encourages employees to report actual or potential incidents of wrongdoing without the fear of retaliation.

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## III. BRIBES AND KICKBACKS

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Bribes and kickbacks are illegal and are strictly prohibited. Employees involved with the marketing or sale of MED3000 products and services are strictly prohibited from making payments of any kind which may violate the Anti-Kickback Statute or Stark Law, primarily to induce clients to purchase MED3000 products or services. Employees are required to be familiar with MED3000 related policies. Business arrangements with a physician or other client should be outlined in a written document, and approved by legal counsel.

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## IV. LEGAL AND REGULATORY COMPLIANCE

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The Code of Conduct sets forth the organization's standards for business practices and regulatory compliance. MED3000 is committed to ethical behavior, and legal and regulatory compliance. Services are provided pursuant to federal, state and local regulations. MED3000 employees shall conduct their business in compliance with all applicable federal and state laws and regulations and in accordance with MED3000 policies and procedures, in order to maintain an environment that is committed to integrity and ethical conduct. Relevant laws and regulations applicable to MED3000's operations shall be observed, even if they are not covered in the Code of Conduct.

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## V. BUSINESS AND FINANCIAL INFORMATION

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### **Accuracy, Retention and Disposal of Documents and Records**

Records should be kept for the minimum number of years to be consistent with federal and state regulations. In addition, if asked by legal counsel to retain records relevant to litigation, audit or investigation, the records shall be sequestered. Questions regarding the correct length of time to retain a record should be addressed with the CCO.

No one may falsify information on any record or document or alter it in any way that makes it misleading or inaccurate. In addition, records may never be destroyed in an effort to deny access to governmental authorities which may be relevant to an investigation. When appropriate, medical and business records may only be destroyed as specified by the law and MED3000's policies. Medical and business documents include paper documents and any form of electronic media.

### **Claims Processing**

MED3000 is committed to processing claims as required by applicable laws and regulations. MED3000 shall have implemented policies, procedures and systems that conform to federal and state laws and regulations. Billing and coding staff are required to know the applicable rules for submission of its bills and claims for reimbursement.

It is important that employees involved in claims processing provide accurate information and do not destroy any information that is considered part of the designated record set. Therefore, employees are prohibited from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious or fraudulent.

### **Confidential Information**

The term "confidential information" refers to confidential protected health information and MED3000 proprietary information. It covers data maintained by MED3000 that is not publicly known, such as personnel data, patient lists and clinical information, patient financial information, passwords, information pertaining to acquisitions, divestitures, affiliations and mergers, financial data and proprietary computer software.

Many MED3000 personnel have access to sensitive, confidential and proprietary information as a part of their job and shall not share this information outside the company.

Employees shall not access information unless they have a legitimate business need to know in order to perform their job responsibilities. Employees with access to confidential information shall be required to agree and sign a Confidentiality Agreement upon employment. If an individual's employment or contractual relationship with MED3000 ends for any reason, he/she will still be bound by the stipulations of the confidentiality agreement.

Confidential information is generated and contained within MED3000's information systems. Therefore, it is essential that each employee protect the information contained within these information systems by not sharing passwords and by reviewing and adhering to MED3000's information security policies. In addition, confidential information containing protected health information (PHI) should not be sent over the Internet except when sent with appropriate protections in place (e.g. password protection, encryption, etc.). Employees should follow MED3000 information security policies in accordance with applicable federal and state laws and generally accepted industry security standards. MED3000 proprietary information and that of its clients should not be sent over the Internet except when appropriate during the normal course of business. However, sending highly sensitive information should be avoided whenever possible. Employee use of confidential information for personal gain or for the benefit of another person or entity while associated with MED3000 is prohibited. Improper or unauthorized use or disclosure of confidential information may lead to disciplinary action up to and including termination.

### **Electronic Media and Security Requirement**

MED3000 is committed to protecting all aspects of its information systems. Employees that are given access to MED3000's information systems to conduct business, shall sign and abide by the MED3000 Acceptable Use Policy, including the protection of confidential passwords and other information. All electronic communications and electronic media devices shall be maintained in a secure place and are to be used primarily for business purposes. Limited reasonable personal use of MED3000's communications systems is permitted, but employees should assume that these communications are not private. Employees who abuse communications systems or use them excessively for inappropriate or non-business purposes may lose their privileges and shall be subject to disciplinary action up to and including termination.

MED3000 electronic data shall be protected from unauthorized disclosure, misuse, improper alteration or destruction. MED3000 information systems may not be used for activities that are unlawful, violate organizational policies, or result in a liability or embarrassment to MED3000. MED3000 reserves the right to review and monitor the use of systems and contents of individual files.

### **Financial Reporting and Records**

Employees whose job responsibilities include financial recording of MED3000's transactions should familiarize themselves with applicable policies and be committed to transparency in financial reporting. Financial information must reflect actual transactions and abide by generally accepted accounting principles. Funds and assets shall be properly recorded in MED3000's books. A system of internal controls shall exist to provide reasonable assurances that all transactions are executed in accordance with and recorded according to organizational policy. Any transactions that may appear to be recorded fraudulently should be immediately reported to the CCO.

### **Intellectual Property Rights and Obligations**

MED3000's intellectual property rights are valuable assets. Use of intellectual property outside of the normal ordinary course of business must be cleared in advance by the CCO, the CEO, or internal legal counsel and suspected misuse of intellectual property should be reported. Inappropriate use of intellectual property may expose MED3000 and the employee to criminal and civil fines and penalties. The CCO or the CEO should be consulted before soliciting, accepting or using proprietary information from others or letting others use or have access to MED3000's proprietary information.

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## **VI. WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES**

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### **Conflict of Interest**

Conflict of Interest (COI) refers to situations in which an individual's (or an individual's family member's) financial, professional or other personal considerations may knowingly directly or indirectly affect, or have the appearance of affecting, his/her professional judgment in exercising any MED3000 duty or responsibility. MED3000 employees are expected to disclose any outside activities and financial interests that may represent a COI or have the appearance of being a COI. Employees with questions related to whether an outside activity may constitute a COI, should obtain guidance from the CCO, who will consult with the Compliance Committee. Individuals are required to submit a COI Disclosure Form upon initial employment and update it annually and when there are known changes. Business relationships with relatives, spouses, significant others and/or close friends where the relationship may affect the employee's judgment may create a conflict of interest.

### **Controlled Substances, Substance Abuse and Mental Acuity**

MED3000 prohibits the unlawful possession, use, manufacture or distribution of illicit drugs on its property or as part of any company sponsored activity. To protect the interests of employees, MED3000 is committed to an alcohol and drug-free work environment. All employees must report for work, free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol; having an illegal drug in their system; or using, possessing, or selling illegal drugs during working hours or while on MED3000 property may result in an employee's immediate termination. Drug testing may be used as a means of enforcing this policy.

MED3000 does not permit the use of alcohol on its property or as part of any company sponsored activity, except in instances where it has been pre-approved by executive leadership with appropriate controls in place.

Employees who observe the use of alcohol, illegal drugs, or misuse of prescription drugs, should report their observation to their manager, Human Resources or to the Compliance and Ethics Office.

## **Copyrights**

MED3000 employees shall comply with applicable laws and licenses regarding the use of intellectual property, including, but not limited to, copyright laws and software licensing agreements. Employees are prohibited from knowingly reproducing, distributing, displaying or altering copyrighted materials without the express written consent of the owner. Peer-to-peer or other file-sharing of copyrighted material is also prohibited as MED3000's communication systems may not be used to send copyrighted documents that are not authorized for reproduction.

## **Diversity and Equal Employment Opportunity**

MED3000 is committed to provide an inclusive work environment where employees are treated with fairness, dignity and respect and strive to create and maintain a setting where cultural and other differences are celebrated at all levels. MED3000 abides by the laws, regulations and policies relating to diversity and as such, does not discriminate on the basis of race, color, religion, sex, national or ethnic origin, age, disability, sexual orientation, ancestry, pregnancy status, marital status, mental or physical disability, medical disability, military service, or any other characteristics protected by law in administration of hiring policies, programs or activities. Employment is based solely upon individual merit and qualifications directly related to professional competence.

## **Harassment and Workplace Violence**

Each MED3000 employee has the right to work in an environment free of harassment and disruptive behavior. As such, MED3000 prohibits unlawful harassment in any form, verbal, physical or visual based on the diverse characteristics or cultural backgrounds of those who work for the organization. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct will not be tolerated. If harassment is suspected, it should be reported to Human Resources or the Chief Compliance and Ethics Officer if the employee is not comfortable reporting to HR. The complaint will promptly be investigated.

Sexual harassment is prohibited. This includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment is included in this prohibition.

Harassment also encompasses workplace violence, which includes robbery, stalking, violence, terrorism and hate crimes. MED3000 is committed to a violence-free work environment, and will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should an employee, or anyone else, bring weapons, explosive devices, or similarly dangerous materials to work or while they are otherwise performing the duties and responsibilities of their job. Employees who experience or observe harassment, violence or weapons in the workplace should report the incident to Human Resources immediately.

## **Health and Safety**

MED3000 facilities comply with government regulations, rules, policies and required facility practices that promote the protection of workplace health and safety. MED3000's policies have been developed to protect employees from potential workplace hazards. Employees should familiarize themselves with these policies and apply the information to their specific job responsibilities. Employees may seek advice from the Safety Officer whenever they have a concern. It is important that each employee immediately advise a supervisor or the Safety Officer of any serious workplace injury or situation presenting a danger of injury in order for corrective action to be taken to correct the issue.

## **Ineligible Persons**

MED3000 does not knowingly contract with, or employ individuals that are excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or previously convicted of a criminal offense related to the provision of healthcare items or services. Human Resources shall routinely search the Department of Health and Human Services' Office of Inspector General and General Services Administration's lists of such excluded and ineligible persons.

Individuals must disclose immediately any debarment, exclusion, suspension or other event that makes the person an ineligible person. This individual is excluded, suspended, debarred or otherwise ineligible to work in healthcare in certain capacities. Therefore, individuals shall disclose if he/she is an ineligible person at the time of the initial hiring, credentialing, or contracting process, or upon becoming an ineligible person in the future. In addition, all prospective employees shall be screened prior to employment to assure that they have not been declared ineligible to participate in the federal healthcare programs. Existing employees will also be checked periodically for possible sanctions. Vendors will periodically be checked against the government websites prior to engaging in business with the company.

### **License and Certification Renewals**

Employees and individuals retained as contractors who require professional licenses, certifications, registrations and/or other credentials are responsible for maintaining their credentials in active and current status. These individuals shall comply at all times with federal and state requirements applicable to their disciplines. MED3000 may require evidence that the individual has a current license, certification, registration or credentialed status. If required for their current position or service provided, MED3000 will not permit any employees or contractors to work without applicable valid current licenses, certifications, registrations or credentials. It is the responsibility of the individual to keep their license current.

### **Personal Use of MED3000 Resources**

It is the responsibility of MED3000 employees to preserve the organization's assets, including time, materials, supplies, equipment and information. MED3000 assets are to be maintained for business-related purposes. As a general rule, the personal use of MED3000 resources without prior written approval is prohibited.

### **Relationships among MED3000 Employees**

MED3000 is committed to maintaining an ethical culture. However, during the course of day-to-day operations, issues may arise related to people in the organization and how they relate to one another.

MED3000 supports an environment that directly and openly resolves conflicts in a timely manner. Every effort should be made to resolve conflicts in a reasonable and civil manner. When employees are unable to resolve differences in this manner, they are encouraged to seek assistance from their manager or Human Resources.

### **Relationships with Subcontractors and Suppliers**

MED3000 promotes competitive procurement to the maximum extent practicable. Selection of consultants, subcontractors, suppliers and vendors will be made in a fair and reasonable manner, free from conflicts of interest and based on objective criteria, including quality, technical excellence, price and delivery, adherence to schedule, service and maintenance of adequate sources of supply. Decisions will be based on the ability to meet MED3000's needs and not on personal relationships. MED3000 promotes high ethical standards in business practices in source selection, negotiation, determination of contract awards and the administration of purchasing activities. The organization complies with contractual obligations not to disclose vendor confidential information unless otherwise permitted.

### **Research, Investigations and Clinical Trials**

MED3000 is committed to adhering to federal and state rules and regulations pertaining to clinical trial coding and billing for research involving human subjects. As such, MED3000 performs the billing as provided by the client and would not be aware if the billing involved clinical trials unless otherwise informed by the client. However, should MED3000 become aware of the need to perform clinical trial billing, MED3000 would follow the billing requirements of federally funded programs as part of a patient's participation in a clinical trial.

Client requests to perform services regarding clinical trial processing by MED3000, shall be discussed with the Chief Compliance and Ethics Officer prior to performing such services.

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## **VII. MARKETING PRACTICES**

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### **Antitrust**

Antitrust laws are designed to create a level playing field in the marketplace and to encourage and protect free and fair competition.

Employees should have a basic knowledge of how these laws apply to their job to assure MED3000 complies with the laws. In general, employees should avoid discussing sensitive subjects with competitors or suppliers unless they are proceeding with the advice of legal counsel. If a competitor raises a prohibited subject, such as pricing, marketing plans or labor costs, the employee shall end the conversation immediately by: informing the individual(s) that they cannot engage in discussion about the subject, changing the topic of discussion or removing themselves from participation in discussion of the subject. Employees shall document their refusal to discuss the topic and shall notify legal counsel of the incident.

## **Marketing and Advertising**

MED3000 may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of services and for recruitment. Only truthful, informative and non-deceptive information may be presented.

## **U.S. Foreign Corrupt Practices Act**

The U.S. Foreign Corrupt Practices Act specifically prohibits offering or giving anything of value to a non-U.S. government official to influence official action or secure an improper advantage. This not only includes traditional gifts, but also things like travel, political or charitable contributions and job offers. These improper benefits must be distinguished from reasonable, infrequent and moderate expenditures for gifts and business entertainment for government officials, as well as travel and lodging expenses for trips directly promoting MED3000's products or services. Payment of such expenses can be acceptable, subject to specific requirements, including pre-approval. Guidance on these rules can be obtained from legal counsel.

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## **VIII. ENVIRONMENTAL AND OSHA COMPLIANCE**

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MED3000 is committed to providing a safe work environment by complying with applicable environmental and Occupational Safety and Health Administration (OSHA) laws and regulations and operating each of their facilities with the necessary permits, approvals and controls. In addition, MED3000 acts to preserve natural resources to the full extent reasonably possible. MED3000 employees should understand how job duties may impact the environment and adhere to the requirements for the proper handling of hazardous materials.

Unsafe work conditions or work-related injuries, accidents or illnesses must be reported immediately. If an environmental hazard is suspected, it should be reported to Human Resources who will also notify the Compliance and Ethics Office.

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## **IX. GIFTS AND TRAVEL AND ENTERTAINMENT**

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### **Gifts - General**

MED3000 is subject to both U.S. domestic and international laws that prohibit bribery. Bribery is not permitted at any time, for any reason. Employees should also be careful when giving or receiving gifts, entertainment or other business courtesies on behalf of MED3000 to avoid the possibility of it being perceived as a bribe. Therefore, it is best to provide such business courtesies infrequently and of nominal value as per MED3000 policy.

Employees should not accept significant gifts, entertainment or any other business courtesy (including discounts or benefits that are not made available to all employees) from any customers, suppliers, partners or competitors if the gift would likely be perceived as influencing their business decisions or otherwise creating a conflict of interest.

Prior to accepting invitations that include travel and overnight accommodations, approval shall be obtained from legal counsel. Employees may accept gifts with a nominal value from any individual or organization that has a business relationship with MED3000. Employees may not accept gift certificates or cash in accordance with the Internal Revenue Service rules. Solicitation and/or acceptance of gifts or hospitality shall follow the Conflict of Interest Policy.

Employees should not feel compelled to give a gift to anyone and any gifts offered or received shall be appropriate to the circumstance and not lavish. Another common situation involves fund-raising. No employee should feel obligated to participate in fund-raising undertaken by MED3000 or another MED3000 employee. Similarly, when the organization decides to support a charitable organization, no employee should feel obligated to contribute.

### **Extending Business Courtesies to Non-Referral Sources**

Business courtesies, when given, are for the purpose of fostering a collaborative business relationship. An employee should never extend a gift or offer that may be perceived as a bribe or kickback. Meals and entertainment may be provided to colleagues to further develop a business relationship. The purpose of the entertainment shall not be to induce any favorable business action, but business will be discussed. These expenses cannot include travel costs or costs for overnight lodging. The cost of the entertainment event shall be reasonable and appropriate, generally considered to be of nominal value. Such entertainment with respect to any

particular individual shall be infrequent. Any events that exceed these limits require establishing a business necessity and appropriateness and are discouraged.

Gifts or incentives shall not be used to improperly influence relationships or business outcomes. Gifts to non-government employees should be limited to a nominal value. MED3000 does not provide any gifts, entertainment, meals or anything else of value to any employee of the Government, except for minor refreshments in connection with business discussions.

### **Travel and Entertainment**

MED3000 pays for business travel costs as permitted by MED3000 policy. These costs generally should not be paid for by others. You may accept meals or entertainment included for all attendees during conferences and similar meetings. You may also occasionally accept meals or entertainment offered in conjunction with meetings to discuss MED3000 business. If you have questions regarding acceptable situations, consult with [compliance\\_askus@MED3000.com](mailto:compliance_askus@MED3000.com).

You may be paid (often referred to as an “honorarium”) by others for participating in activities, professional forums or surveys that are related to MED3000 or our business interests if you obtain approval from the CCO or CEO. If you are on a professional committee or make a platform speech, you generally may accept the event sponsor's offer to pay reasonable travel costs as long as other committee members or speakers who are not MED3000 employees are treated equally.

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## **X. INTERACTING WITH THE MEDIA, THE GOVERNMENT, AN OUTSIDE PARTY OR ORGANIZATION, GOVERNMENTAL RELATIONS, AND POLITICAL ACTIVITIES**

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### **Interacting with the Media, the Government or an Outside Party or Organization**

Employees may not speak on behalf of MED3000 unless prior approval has been obtained from the CEO. Your own views should be kept separate from those views of MED3000. Employees should not post personal views using your MED3000 email or title. MED3000 funds may not be used to hire a lobbyist or to make a political donation. To protect both you and the company, employees who are contacted by the media should refer the media contact to Corporate Marketing at: [marketing@MED3000.com](mailto:marketing@MED3000.com).

Employees who are contacted by any outside agencies (e.g. government agencies) need to contact the Compliance and Ethics Office either by phone or via email at: [compliance\\_askus@MED3000.com](mailto:compliance_askus@MED3000.com).

### **Internal Company Communications**

Communications that are delivered outside of MED3000 such as emails, mailings, telephone conversations, speeches or presentations and may be addressed to more than one person, should be reviewed to be sure that the right tone and message is delivered. These types of communications may include: the media, clients, potential clients, and legal counsel of our clients. Media requests should be referred to the Corporate Marketing Department and be approved by the CEO. Internal communications intended for internal recipients should not be sent outside of the company.

### **Dealing with the Media**

If an employee is contacted by the media, immediately notify the Corporate Marketing Department who is available for assistance and support. The Corporate Marketing Department will review the request with the CEO to obtain approval. The Corporate Marketing Department can also be contacted at: [marketing@MED3000.com](mailto:marketing@MED3000.com).

### **Media Access**

If pre-approved, members of the media are welcome at the MED3000 offices. However, they need to contact the Corporate Marketing Department in advance of their visit.

For the safety and privacy of employees, business partners and visitors, photography or videography is expressly prohibited without the prior approval of the Corporate Marketing Department. MED3000 is willing to assist reporters, photographers and videographers to provide access to areas for interviews and background footage, but arrangements need to be made in advance.

## **Personal Communications**

Do not use MED3000 letterhead or titles when you write about issues that are not related to MED3000. There are times when you may use letterhead for civic, public service or charity events, but only if you receive approval. Do not link MED3000 to your own opinions when you speak, write or take part in personal activities, unless you have received approval from your manager to do so. This includes use of the Internet.

Employees, who regularly interact with the media on MED3000's behalf, must not disagree in public with MED3000's official positions, as this may be difficult for the media to separate the personal views of these employees from the official position of MED3000.

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## **FULL VERSION OF THE CODE OF CONDUCT**

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This brochure summarizes the topics found in the full version of the Code of Conduct. For the full version of the Code of Conduct, please go to the [www.MED3000.com](http://www.MED3000.com). Employee Support tab, and log-in. Once in the employee portal, please go to the Compliance and Ethics page under Employee Support for the full document.

For further questions on the Code of Conduct policy or compliance and ethics issues, please feel free to contact MED3000's Compliance & Ethics Office at [compliance\\_askus@MED3000.com](mailto:compliance_askus@MED3000.com).

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## **ETHICS POINT HOTLINE**

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The Compliance & Ethics Office has an ethics hot-line. The hot-line is answered by an outside company, EthicsPoint. If you have any concerns regarding activity in the company that may not be ethical or legal, or are asked to participate in any activity that may violate this Code of Conduct, contact EthicsPoint to file a report.

You can either file online at [www.ethicspoint.com](http://www.ethicspoint.com), or call 1-866-294-7825. Both methods provide the option of remaining anonymous.

For further questions on the Code of Conduct policy or compliance and ethics issues, please feel free to contact MED3000's Compliance & Ethics Office at [compliance\\_askus@MED3000.com](mailto:compliance_askus@MED3000.com).

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**XI. ACKNOWLEDGEMENT FORM - MED3000 CODE OF CONDUCT**

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I acknowledge that I have received and reviewed the MED3000 Code of Conduct and agree to abide by such Code of Conduct. I understand my responsibilities under this code and acknowledge that I have had the opportunity to ask questions via the available resources as documented.

**Signature:**

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**Printed Name (as listed on personnel records):**

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**Department:**

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**Office Location:**

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**Date:**

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*Instructions:  
All MED3000 employees are required to read the Code of Conduct.*

*Tear off this acknowledgment form, sign and submit the completed form to your Human Resources Representative. Should you not be familiar with the name of your HR Representative, contact Corporate Human Resources at: 412-937-8887.*