



# Tenet Standards of Conduct



Together we're moving health *forward.*



Dear Tenet colleague,

Integrity and compliance matter every day, in every situation. It is central to everything we do as caregivers and operators. A strong culture of compliance helps ensure that our patients receive care that is focused on their needs, that our communities trust us to be responsible corporate citizens, and that our shareholders and other key constituents have confidence that we will do the right thing, every time.

Operating our business ethically and compliantly is both a collective obligation and an individual responsibility. Our Compliance Program represents a shared undertaking of all colleagues, ranging from our executives to the most junior employees. It was created to go beyond just knowing the rules; all colleagues are expected to take ownership of compliance and to perform all tasks with integrity.

The Standards of Conduct outlined in the following pages set the basic principles we must follow in order to earn and maintain the trust of our patients, communities, business partners, and shareholders. Of course, no set of standards can adequately anticipate every situation we might encounter at work.

When you see or hear something that doesn't seem right, reach out to seek help. Talk with your supervisor, your local compliance officer, call the Ethics Action Line at 1-800-8-ETHICS, or email us at [ethics@tenethealth.com](mailto:ethics@tenethealth.com). You have the option to call or email anonymously 24 hours a day, seven days a week. When someone raises a good faith concern, calls the Ethics Action Line, or cooperates with an investigation or corrective action, retaliation against that person is strictly prohibited. By working together, we can create an environment where we uphold the spirit and values that define our company.

Thank you for all that you do to serve our hospitals, our patients, our clients, and our colleagues. Compliance matters and you truly do make a difference.

Sincerely,

Howard Hacker  
Chief Compliance Officer



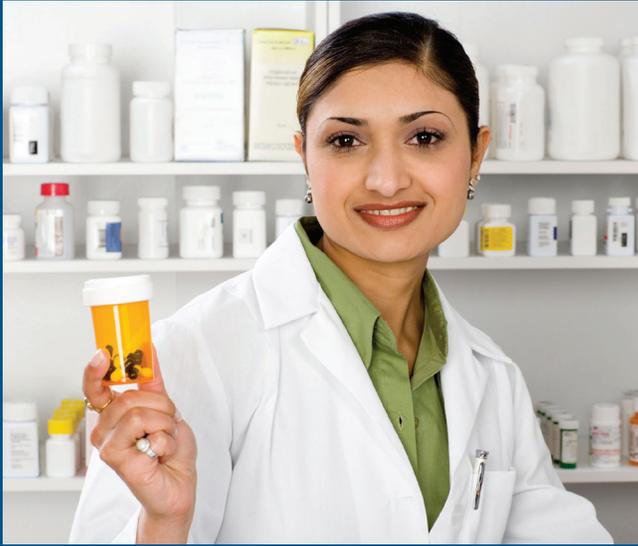
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## Terminology

In these Standards of Conduct, the terms "Tenet," "the company," "we," "us" or "our" refer to Tenet Healthcare Corporation and/or its subsidiaries or affiliates. The hospitals, facilities and programs described in these Standards are owned and/or operated by subsidiaries or affiliates of Tenet Healthcare Corporation.

# Our Mission and Values



“Quality is never an accident; it is always the result of high intention, sincere effort, intelligent direction and skillful execution; it represents the wise choice of many alternatives.”



At Tenet, our business is health care. Our mission is to improve the quality of life of every patient who enters our doors. Our approach makes us unique and defines our future.

As we seek to improve the quality of our patients' lives, to serve our communities, to provide an exceptional environment for our employees and affiliated physicians and provide an attractive return to our shareholders, we are guided by five core values:

- **Quality.** Quality is at the core of everything we do and every decision we make.
- **Integrity.** We manage our business with integrity and the highest ethical standards.
- **Service.** We have a culture of service that values teamwork and focuses on the needs of others.
- **Innovation.** We have a culture of innovation that creates new solutions for our patients, physicians and employees.
- **Transparency.** We operate with transparency by measuring our results and sharing them with others.

These values are the reasons our patients and physicians choose us, and we seek relationships with those who share them.

# Care with Integrity

## **We define ourselves by our values.**

In 2003, Tenet's board of directors and CEO set a new path for the company—one based on the values of integrity, service, innovation and transparency. The Standards describe how to make decisions that support these values. Because value-based decisions are so critical, these Standards are a condition of employment for every Tenet employee. They ensure that we make consistent decisions that are in the best interests of our patients, our shareholders and Tenet.

## **We do the right thing the first time, every time.**

As Martin Luther King Jr. said, "The time is always right to do what is right," and each Tenet employee has an obligation to do the right thing the first time, every time. Doing the right thing is your responsibility and nobody has the authority to instruct you to deviate from these Standards. Contact the Ethics Action Line if you feel that anyone has asked you to violate these Standards.

## **We see it, say it and fix it.**

At Tenet, if we see a problem, we "say it" by identifying it to others, and we fix it. Doing the right thing means standing up for Tenet's values even when it is not convenient. If you see something that is wrong, say it and fix it. We must all hold each other accountable for doing the right thing, and you have the full support of Tenet when you do.

## **We get help when the right choice is not clear.**

If you need help or are unclear about what to do, you have the responsibility to get help. Use the Ethical Decisions Guide at the back of these Standards when you are confronted with a tough choice. You also can talk with your manager or hospital compliance officer or contact the Ethics Action Line.

## **We are committed to meeting federal health care program requirements.**

Tenet hospitals treat patients who are covered by Medicare, Medicaid, TRICARE and other federal health care programs. Federal health care programs have many requirements that are designed to ensure that taxpayer dollars are spent only on care that is needed and of appropriate quality. Tenet is fully committed to following the requirements of all federal health care programs and failure to do so will lead to disciplinary action up to and including termination.

Every day, Tenet employees are united by our mission to improve the quality of our patients' lives. This common thread makes working for Tenet a special experience and receiving care at our facilities different from other health care experiences.

In order for every patient, physician and employee to experience this difference, it is essential that every Tenet employee uphold these Standards of Conduct.

These Standards define what it means to be a Tenet employee, and you simply cannot work here without committing to them.



## **What the Standards Mean to Me:**

- My decisions support Tenet's values.
- I am responsible for my decisions and doing the right thing.
- I raise issues that are inconsistent with our values.
- I use the Ethical Decisions Guide when the right decision is not clear.
- I solve problems.
- I comply with federal health care programs.

# Care that Meets Our Standards

When you strive to provide excellent service, standards are important. Standards are the lines over which we will not cross even if it would be convenient. The Standards of Conduct help us identify, learn and use those lines in our daily decisions.



## We Are All Required To:

- Read and certify your understanding of the Standards within 30 days of employment and annually.
- Use the Standards in your daily decisions.
- Follow Tenet policies.
- Talk about the Standards and their application with your supervisor or manager.
- Contact the Ethics Action Line with questions.
- Report violations.
- Participate in training on these Standards.

## Additional Actions for Managers:

- Set the right ethical tone in your work areas.
- Explain how your decisions are based on our values and these Standards.
- Answer questions and support employees who raise good faith concerns.
- Seek guidance when the right action is unclear.

## The Standards apply to all of us.

These Standards apply to every Tenet employee, as well as the corporate board of directors, governing boards and contractors when they are acting on behalf of Tenet. Failure to follow or report a suspected violation of these Standards, Tenet policies and procedures or federal health care program requirements will result in disciplinary action up to and including termination. Within your first 30 days as a Tenet employee and each year thereafter, you are required to certify that you have read and understood these Standards. Many of our contractors also are required to sign a certification. If you have questions about your responsibilities, contact your hospital or corporate compliance officer.

## Managers have a special responsibility.

Tenet managers are expected to exhibit five leadership characteristics: Character, Change, Communication, Capacity and Collaboration. These attributes reflect a manager's special responsibility to set the right tone for learning and understanding in their work areas. It is essential that everyone reporting to our managers understands how their work relates to Tenet's values. That means managers must talk about Tenet's values and encourage all employees to ask questions. Answering a question with "because we've always done it that way" stifles innovation and keeps us from being our best.

Managers also must set an ethical example and take action when ethical issues are raised. They are responsible for ensuring that their employees know these Standards and for supporting employees who report violations in good faith. Managers are responsible for seeking help from the Ethics Action Line for themselves and their employees when the right action is not clear.

## We follow Tenet policies.

Health care is a heavily regulated business, and it is important to get the details right by following our policies and procedures. For Tenet's policies and procedures, go to Compliance Central on eTenet or Tenet's public Web site at [www.tenethealth.com](http://www.tenethealth.com). The policies are organized into eight compliance risk areas: quality; medical necessity; qualified physicians and staff; financial incentives; licensure and certification; patient rights; reimbursement; and documentation, charging, coding and billing. Failure to follow Tenet's policies and procedures will result in disciplinary action up to and including termination.

## Tenet's Quality, Compliance and Ethics Program Charter reflects our values.

Tenet's Quality, Compliance and Ethics Program Charter establishes the scope of Tenet's ethics and compliance program. The Charter was voluntarily adopted by Tenet management to further Tenet's commitment to compliance, high ethical standards and our core values of quality, integrity, service, innovation and transparency. The Charter requires that every Tenet employee:

- Follow the Standards of Conduct as a condition of employment;
- Participate in annual ethics training and specialized compliance training tailored to our job duties.
- Work with our facility, regional, home office and Conifer compliance teams to resolve issues of concern; and
- Contact the Ethics Action Line if issues of concern are not resolved timely or to our satisfaction.

The full text of the Charter is available on Compliance Portal on eTenet and on [www.tenethealth.com](http://www.tenethealth.com). Supervisors and managers are responsible for ensuring their employees and contractors strictly comply with the Charter.

### **If you feel that the right action would conflict with these Standards, you are required to seek pre-clearance from the Chief Compliance Officer.**

If you feel that following the Standards would result in an incorrect or unethical result, you must seek a written pre-clearance from the Chief Compliance Officer before proceeding. To seek pre-clearance, email the ethics and compliance department at [ethics@tenethealth.com](mailto:ethics@tenethealth.com). The Chief Compliance Officer will consider your request and advise you on how to proceed.

When you strive to provide excellent service, standards are important. Standards are the lines over which we will not cross even if it would be convenient. The Standards of Conduct help us identify, learn and use those lines in our daily decisions.



# Care with Transparency

Transparency means being open and honest in our communications with each other and with the public. It means making decisions that can be scrutinized and understood by others.

Transparency protects our most important asset our reputation.

## **We Are All Required To:**

- See it, say it and fix it.

## **Additional Actions for Managers:**

- Create an environment where employees are free to report issues without fear of retaliation.
- Support employees who report issues in good faith.
- Solve problems and get help if needed.

## **Transparency supports our values.**

In order to improve quality of care, we must be transparent, particularly when we make a mistake. When we identify mistakes we can learn from them, but if we do not identify mistakes, we miss out on lessons learned. Tenet employees should feel comfortable raising their hands and saying “I made a mistake,” and managers are responsible for promoting an environment where problems are raised and—most importantly—solved without fear of retaliation.

## **Tenet’s culture of transparency is supported throughout the company.**

The commitment to non-retaliation comes straight from Tenet’s corporate board of directors and is administered by Tenet’s Chief Compliance Officer who reports directly to the Tenet board. When someone raises a good faith concern, calls the Ethics Action Line or cooperates with an investigation or corrective action, retaliation against that person is not permitted. Tenet takes reports of retaliation very seriously. If you feel that you have experienced retaliation, immediately report it to the appropriate manager who is not involved in the issue or contact the Ethics Action Line. Any time there is an allegation of retaliation, the allegation will be investigated and appropriate steps will be taken to protect those who report retaliation.

## **The Ethics Action Line works.**

If you contact the Ethics Action Line, your call will be answered by an ethics advisor 24 hours a day, seven days a week. After hours and on weekends, the Ethics Action Line is answered by a third party engaged by Tenet to provide additional coverage. The ethics advisor will ask you specific questions to better understand your concerns.

When reporting, it is important for you to have as many facts as possible so the ethics advisor can give the most appropriate advice to you and/or report the information to the appropriate individuals for investigation and resolution. Callers may call back and check on the status of the investigation. To protect your confidentiality and privacy, we do not disclose the details of the investigation or any disciplinary action. However, the Ethics Action Line will inform you whether the investigation is complete and if the issues were addressed.

## **Example of Tenet’s No Retaliation Policy**

If a circulating nurse in the operating room reports that a surgeon is not participating in the time out performed to confirm the right patient, right procedure and right side/site, an investigation will be conducted. If there is any attempt to remove the nurse from the schedule, discipline or terminate the nurse because the nurse raised a good faith concern about quality, the compliance officer, human resources representative and leadership will stop the retaliation and take the appropriate steps.

## **The Ethics Action Line is independent and anonymous.**

The ethics advisors who answer the Ethics Action Line report to our Chief Compliance Officer who reports directly to the Tenet board. The Ethics Action Line does not have access to caller ID and thus you can make your call anonymously if you wish. When you call, we need enough details to investigate your concerns including the department, facility and, in some limited circumstances, your name. If the caller discloses his or her name but requests confidentiality, the Ethics Action Line will keep this information confidential to the extent permitted by law.

## **All reports of an ethical violation must be made in good faith.**

Do not make an ethics report if you do not believe in good faith that the Standards of Conduct have been violated. Do not twist or make up facts to get someone else in trouble. Appropriate disciplinary action will be taken if information has not been provided in good faith.

## **See it. Say it. Fix it.**

See it...

- Speak up if you see or think you see something that violates these Standards. You cannot look the other way.

Say it...

- to your coworkers. You should feel comfortable speaking up to your coworkers. Sometimes, all we need is a simple reminder.
- to your manager. If you do not feel comfortable talking to your coworkers, turn to your manager. Managers are responsible for creating a workplace where employees are comfortable raising issues without fear of retaliation. If your manager asks you to do something inappropriate or something that would violate these Standards, go "one over" your manager or call the Ethics Action Line. Your concerns will be investigated, and retaliation will not be tolerated.
- to your human resources representative. Issues involving employment matters should be taken to human resources.
- to your hospital compliance officer. Your hospital compliance officer is available to answer your questions and discuss your concerns. Your regional compliance director and Tenet's chief compliance officer are also available to assist you if you want to speak to someone outside your facility.
- to the Ethics Action Line. If you do not feel that you can address your concern at the local level, call the Ethics Action Line at 1-800-8ETHICS or email [ethics@tenethealth.com](mailto:ethics@tenethealth.com). The Ethics Action Line is available to guide you and answer your questions or to report a concern.

Fix it...

- When you see and say an issue, do not forget to help fix it. Many issues can and should be corrected on the spot. In some cases, the solution may require action by your manager or others, and everyone is required to help resolve any concerns.

## **What about accounting concerns?**

You are required to contact the Ethics Action Line if you see or think you see accounting improprieties or have concerns about Tenet's internal financial controls or audits. The Ethics Action Line reports concerns to the audit committee of the Tenet board of directors. You also may report directly to the attention of the audit committee at the address listed in the Support section on page 19.

# Care with Honesty

Our word is our bond, and we do not take that lightly. Our U.S. health care system is one of the largest and most complex honor systems in the world. It depends on providers like us to do the right thing by honestly performing and billing for their services.

We recognize that the law is a minimum standard of behavior—not a maximum—and we follow the spirit of the law. It is a good business practice to ensure that our behavior is not so close to the line that someone else might question whether it is lawful.

## **We Are All Required To:**

- Tell someone if you see an error or something false and fix it.
- Not sign your name unless you know the statement is true.
- Not sign other people's names or share passwords.
- Raise possible dishonesty with your manager, hospital compliance officer or the Ethics Action Line.
- Compete fairly.

## **We are honest in what we write, say and do.**

When we make a statement or sign our names to any document, we are confirming that the statement is true. We do not back-date documents, make up entries or make it appear as though we documented something that we did not. We do not sign other people's names to documents, and we do not share each other's passwords.

Our patients depend on us and their physicians to accurately document their medical records. We make every effort to ensure that medical record entries are clear and complete and reflect exactly the care that was provided to a patient. We do not exaggerate or lead others to document in a certain way. If we add to a record, we note the addition as a late entry in accordance with hospital policy.

We ensure that all external reports are filed on time and are complete, accurate and understandable. These include cost reports, Securities and Exchange Commission reports, tax reports, plans of correction and reports to private accrediting bodies like the Joint Commission. When we say we will do something, we follow up to make sure it is done. Our financial records conform to generally accepted accounting principles, and we never attempt to hide expenditures, funds, assets or liabilities.

## **We are honest in our bills for services.**

We make every effort to submit accurate and truthful bills for our services, and we bill only for services that were actually provided, properly documented and coded. We ensure that our bills meet federal health care program requirements, and we do not submit bills that are exaggerated, fictitious or upcoded. If personal knowledge is required to fill out a form, we fill it out only if we have that personal knowledge. If we see a billing error, we involve a manager, compliance officer or the Ethics Action Line. We investigate and correct the error prior to submitting the bill. If we have already billed, we correct the underlying problem and make appropriate refunds. If we are not sure how to correct the error, we report it to a manager, the compliance officer or the Ethics Action Line.

The Federal False Claims Act and Deficit Reduction Act protect government programs including Medicare, Medicaid and TRICARE from fraud and abuse. Tenet complies with these and all laws and has policies to detect, report and prevent waste, fraud and abuse, as well as provide protection for whistleblowers. For additional information, please refer to [www.tenethealth.com](http://www.tenethealth.com).

**If you see a false claim or report, fix it before it is submitted.**

If it has already been submitted, contact your manager, hospital compliance officer or the Ethics Action Line. Failure to do so will lead to disciplinary action up to and including termination.

**We prohibit financial incentives to provide care.**

We never offer, give or receive something of value in hopes of inducing referrals or as a reward for referrals from other businesses. The “something of value” does not have to just be money. It can also be services, gifts, entertainment or anything else that has value to the recipient. We never offer, accept or give bribes or kickbacks. We never compensate anyone based on referrals. If you believe that someone has offered or received a bribe or kickback, or provided something of value in exchange for referrals, contact the Ethics Action Line. See the section “Care about Limiting Gifts and Entertainment” for additional requirements.

**We respond to government inquiries.**

As a good corporate citizen, Tenet cooperates with government inquiries. At the same time, we consult with the law department and our compliance officer before responding to any non-routine requests to make sure that contacts with government entities are handled properly. We are always clear and truthful in what we say to those who make inquiries. We never alter or destroy records if we are aware of an existing or potential government inquiry.

**We compete fairly.**

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



# Care about Each Other

We all learned the golden rule as children, and it still applies today. We treat each other as we want to be treated. It is as simple as that.



## **We Are All Required To:**

- Treat each other the way that we want to be treated.

## **Additional Actions for Managers:**

- Create an environment in which we can honor and respect each other.

## **We provide care with compassion.**

We treat all our patients equally and with compassion, dignity and respect. We never distinguish among patients based on race, ethnicity, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, veteran status or other characteristics protected by law.

We involve our patients in decisions affecting their care, and we disclose unanticipated outcomes to patients and their families. We obtain their consent for treatment or participation in research, and we confirm that all available options are explained. We review the medical procedures conducted in our facilities to confirm they are medically necessary according to good medical practices, and we seek reimbursement based on the rules of our payors.

## **We value teamwork.**

Health care is a service industry, and teamwork and collaboration are essential to providing excellent service and solving problems—no matter how big or small. We work together to achieve the common goal of serving our patients.

## **We protect the right to privacy.**

Our patients trust that we will protect the information provided to us including their health information and personal data like social security numbers. We release information to vendors or others only in accordance with proper procedures. We take steps to prevent identity theft by protecting social security numbers and other personal data, and securing our systems from unauthorized access. We access health and personal information and share it with coworkers only when authorized to do so and for the purpose of doing our jobs. Sometimes our coworkers become our patients, and when this occurs, we afford our coworkers the same privacy rights as every other patient.

## **We are responsible with Social Media and Technology.**

We never post patient information or photographs to a Web site, social media page or public forum – even if the patient is not identified. We do not use our personal devices to text patient healthcare information for any reason unless otherwise allowed by Tenet policy. We do not take or transmit photographs of patients except as required for patient care and within the requirements of our policies.

## **What if I have a dispute with my manager?**

Your human resources representative will help with employment matters involving personality disputes, diversity and the workplace. Your compliance officer and the Ethics Action Line are available to assist if you have ethics and compliance concerns.

### **We have positive physician relationships.**

We treat our affiliated physicians with respect, and they have the obligation to treat us with respect. We report inappropriate behavior by physicians and vice versa. A human resources representative will investigate inappropriate behavior by a Tenet employee, and the appropriate medical staff committee will investigate inappropriate behavior by a physician. If you are aware of any behavioral issues, contact your compliance officer or the Ethics Action Line.

### **We are committed to diversity and inclusion.**

At Tenet, we believe in a diverse and inclusive environment, one that is grounded in our dedication to the health and well-being of all people. Respecting, nurturing, and encouraging diversity of thought, background, and experience contribute to positive work environments that result in exceptional patient care. We support Tenet's equal opportunity employment and employee development programs that embrace the unique characteristics of our people and our communities and that encourage continuous individual improvement. We embrace the diversity of our coworkers, physicians, vendors and patients. We never harass or discriminate on the basis of race, ethnicity, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, veteran status or any other characteristics protected by law. We embrace diversity because it is our culture, and it is the right thing to do. We are also committed to providing reasonable accommodations to employees who have qualified physical or mental disabilities.

### **Our credentials matter.**

Credentials communicate to our patients and physicians that we are qualified to do our jobs. That's why we are committed to maintaining all required credentials, licenses and certifications. We do not hire, contract with or bill for services rendered by persons or entities who are excluded or are pending exclusion from participating in the federal health care programs by the Office of Inspector General or Government Services Administration. We do not allow caregivers with lapsed or revoked credentials to provide care to patients.

### **We have a safe and drug-free workplace.**

The health and safety of our patients is our primary concern. We follow health and safety policies and regulations that apply to our work and the guidance provided by the facility's safety officer. This includes following procedures for handling and disposing of hazardous materials. We access and handle prescription drugs, controlled substances and other medical supplies only as authorized and administer them only by physician order. We may not be under the influence of alcohol or illegal drugs on company property or during work time. Employees are required to report any unsafe situations to their facility safety officer.

### **We have a positive work environment.**

We do not tolerate conduct that disrupts our work environment including behavior that is disrespectful, hostile, violent, intimidating, threatening or harassing.

Harassment can be particularly harmful to the work environment, thus we have a special responsibility to report any instances of it that we may see or know about. Requests for sexual favors, sexual advances and other unwelcome verbal or physical conduct of a sexual nature are violations of our values and policies. We speak up if a coworker's conduct makes us feel uncomfortable.

# Care about Limiting Gifts and Entertainment

The best “thank you” any vendor can give us is to provide excellent service at a reasonable price.

We do not want anyone to have the impression that we are using our position at Tenet for personal gain or that we cannot be objective.

Our decisions should be based solely on what is best for Tenet and the patients we serve.

## **We Are All Required To:**

- Learn our Standards on gifts and entertainment.
- Communicate our Standards to others.
- Return items or seek advice if gifts or entertainment do not meet these Standards.

## **Additional Actions for Managers:**

- Set an example by knowing and implementing the gift and entertainment policy in your work areas.

## **We do not let perks cloud our decisions.**

All gifts, entertainment and business meals provided or received must be reasonable and small enough that they do not influence our decisions. We never offer or accept anything of value in exchange for referrals or other business.

We communicate to vendors, physicians, patients, customers and others that our values restrict what we can give and receive because we want our services and business relationships to stand on their own. We do recognize that certain items are appropriate and do not present a risk of influencing our decisions. Each Tenet employee needs to be sure that even permitted items do not damage our reputation or integrity under the circumstances. If you are unsure, contact your hospital compliance officer or the Ethics Action Line before offering or receiving such items.

## **What constitutes a gift?**

A gift is any item of value – including everything ranging from marketing items like t-shirts, flowers and gift baskets – if the recipient is not expected to pay for the item.

## **What constitutes entertainment?**

Entertainment is attendance at any event such as a sporting event, concert or play where the recipient is not expected to pay for the entrance fee or ticket.

## **What constitutes a business meal?**

A business meal is any meal where the purpose of the meal is to discuss Tenet business.

## **What if I receive something that is not permitted?**

If an item is not permitted by these Standards, it should be returned with an explanatory note. The only items that do not need to be returned are perishable items such as food or flowers. Perishable items may be donated to a charity or shared in the work area. If returning the gift would create an awkward situation, please call the Ethics Action Line.

## Permitted Gifts and Entertainment.

The following items are permitted but they must be reasonable and appropriate under the circumstances and all requirements of Tenet policy must be met:

Occasional gifts:

- Purchased or reimbursed by Tenet for a Tenet employee.  
Example: A manager may provide a gift card to a coffee store to an employee. Note: Gifts provided by Tenet to employees are the employee's taxable income. Contact the payroll department for guidance. For purposes of the Standards of Conduct, Conifer employees are Tenet employees.
- Purchased personally by a Tenet employee for a Tenet employee.  
Example: A manager may personally purchase a gift card to a book store for an employee. However, the manager should disclose that the gift is from him or her personally to avoid confusion with our Standards.
- Purchased by Tenet for a patient with a retail value that does not exceed \$10 per item and \$50 in total per year per family and is not cash or its equivalent. Contact your compliance officer before proceeding.  
Examples: A hospital may provide a \$10 t-shirt to the parents of a newborn. A hospital may provide a \$10 gift certificate to a restaurant to a patient who had to wait too long for his meal.
- Purchased by Tenet for a vendor or customer, or received from a vendor or customer, with a retail value that does not exceed \$50 per item per employee and \$100 in total per year and is not cash or its equivalent. For purposes of the Standards of Conduct, EMS providers and contracted employees are considered vendors. This includes, but may not be limited to, employees who work for Dell, dietary services vendors, housekeeping vendors, HealthTrust, etc.  
Examples: An accounting firm may purchase a \$50 clock or a retiring Tenet employee. A vendor may provide a \$100 fruit basket to the radiology department if the basket is shared among employees.
- Purchased by Tenet for a physician in limited circumstances as long as the value of the item is within the non-monetary compensation limit, and the item is not cash or its equivalent. Contact your compliance officer before proceeding. Example: A hospital may buy gift baskets valued at \$100 for each member of its medical staff to celebrate Doctors' Day. The hospital must log the value on each physician's non-monetary compensation log without exceeding the limit.

- Received by a Tenet employee from a physician as long as the amount does not exceed \$50 per item per employee and \$100 in total per year, and the item is not cash or its equivalent.

Example: A physician may provide each nurse on the unit a \$50 gift certificate redeemable to purchase a holiday turkey

Occasional business meals:

- Purchased by Tenet for a Tenet employee.  
Example: A lab manager may take his staff to lunch to celebrate the completion of a project.
- Purchased by Tenet for a vendor or customer or received from a vendor or customer.  
Example: A computer hardware vendor may take the information services director to lunch to discuss the performance of the hardware.
- Purchased by Tenet for a physician, or received from a physician, in limited circumstances. Contact your hospital compliance officer before proceeding.  
Example: A chief nursing officer may take the physician who serves as medical director of the ICU to lunch to discuss infection control rates. The physician's medical directorship agreement must state that the physician will attend meals from time to time to discuss the physician's duties.

Occasional business entertainment:

- Purchased by Tenet for a Tenet employee.  
Example: The hospital may host an employee picnic.
- Purchased by Tenet for a vendor or customer, or received from a vendor or customer, as long as the cost paid per employee does not exceed \$100 per vendor or customer in total per year, and the vendor or customer attends the event with the employee to discuss business.  
Example: A vendor may take a quality manager to a museum event with a ticket price of \$50.
- Purchased by Tenet for a physician or received from a physician in limited circumstances. Contact your hospital compliance officer before proceeding.  
Example: The hospital may host an annual physician appreciation dinner that meets the requirements of the law department policy.

## What about gift cards?

We permit gift cards as long as they are not redeemable for cash or free health care items or services. For example, we permit a gift card to a book store, a restaurant or a grocery store. The only time we can provide a gift card redeemable for cash is to an employee. All gifts and gift cards provided to employees are reportable as income.

## Gifts and Entertainment that are not permitted

- Gifts received from patients. We may not accept or solicit gifts from patients in any form. Contact the Tenet government relations department before interacting with government officials.  
Example: A patient may not tip a nurse.
- Gifts received from or purchased for government officials. We may not accept or solicit gifts from government officials. This includes foreign government officials and their agents. Contact the Tenet government relations department or the law department before interacting with any government officials.
- Free health care items or services of any value purchased for or provided to patients, physicians or government officials, unless specifically permitted by Tenet policy.  
Examples: A hospital may not provide a certificate for free non-preventive health care services to a Medicare beneficiary. However, a hospital may donate a free mammogram to a charity.
- Business meals purchased for or received from government officials or patients. Congress passed new rules regarding government officials and representatives. Contact the government relations department before interacting with government officials.  
Example: A hospital may not provide lunch to a member of Congress visiting the hospital.
- Entertainment purchased for or received from government officials or patients.  
Example: A patient may not give an employee tickets to a concert as a thank you.
- Trips purchased for or received from a vendor, customer, patients, government officials or physicians. Tenet employees are required to follow Tenet's travel policy, and Tenet shall pay for all business trips taken by Tenet employees.  
Examples: A vendor may not take an employee to the Super Bowl to discuss business. A vendor may not pay for a trip for an employee to visit the vendor and evaluate its products.
- Cash, traveler's checks, money orders, stock, negotiable instruments, honorariums or other cash equivalents provided to or received from patients, vendors, customers, physicians or government officials.  
Example: A hospital may not provide a \$50 American Express gift card to a physician.

- Items solicited by the recipient, prohibited by the recipient's policies or that would violate the law.  
Example: A hospital may not provide tickets to a concert to a physician who requests them.
- Items provided to or received from anyone being considered during a pending purchasing decision.  
Example: A vendor may not provide a bottle of wine to the materials manager who is considering buying supplies from the vendor.

## Other examples of items that are not permitted:

- An OB unit may not provide a \$100 blanket as a gift to a new mom because it exceeds the \$10 limit.
- A vendor may not provide a \$100 bottle of wine to an employee because it exceeds the \$50 limit.
- The CEO may not take the medical director to dinner every week to discuss his duties because this is not occasional and therefore not reasonable.
- Tenet will not pay for a department manager to take his employees to lunch every week to discuss their work. This is not reasonable.
- A hospital may not provide a \$25 gift certificate to a patient. This exceeds the \$10 limit.
- A vendor may not sponsor a hospital event or an open house for a Tenet facility. This would likely exceed the \$50 limit and may create a real or perceived conflict of interest.

# Care about Conflicts

## **We avoid conflicts of interest.**

In our work, we have a duty to put the interests of Tenet before our own. We avoid conflicts of interest where someone might question whether we are acting for Tenet's benefit or for personal gain. Managers and those who work regularly with vendors are required to annually report any actual or potential conflicts of interest by completing the Conflict of Interest Disclosure form, found on eTenet. In addition, any time a potential conflict arises, we are required to update our annual Conflict of Interest Disclosure by completing a new form and seeking guidance from the ethics and compliance department before proceeding. If you have questions about whether a situation presents a conflict, contact the Ethics Action Line.

## **We disclose and withdraw when conflicts arise.**

If we are ever in a situation where someone might question our loyalty to Tenet or there is the appearance of a conflict, we disclose it and withdraw ourselves from making a decision when we have a conflict. We disclose it to Tenet by completing a Conflict of Interest Disclosure form, and we disclose it to others involved in the situation. We then withdraw from the selection of a vendor by letting someone else make the selection.

For example, perhaps you are tasked with buying the linens at your hospital. Your best friend from college happens to sell linens. Even if your friend offers the best deal, the appearance of a conflict triggers the requirement to disclose the relationship to your manager and complete a Conflict of Interest Disclosure form. In this situation, the ethics and compliance department would advise that the hospital should obtain three bids for the service and that someone other than you should make the purchasing decision. That way, someone who does not have the appearance of a conflict is the decision maker.

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

## **We avoid conflicts when investing in Tenet.**

Investing in Tenet securities provides an opportunity to share in the future growth of the company, but we do not engage in short-term speculation based on fluctuations in the market. These activities may put your personal gain in conflict with the best interests of Tenet and our shareholders. We do not trade in options, warrants, puts and calls or similar derivative instruments on Tenet securities. Contact the law department for additional guidance.

## **You scratch my back, and I scratch yours?**

If you buy a boat from your neighbor who owns a health care consulting business, you have a financial relationship with your neighbor. You would need to disclose this financial relationship if your facility considers contracting with his company. You also would need to ensure that you are not involved in the bid selection process involving your neighbor. The appearance of a quid pro quo relationship is inappropriate and may raise concerns under the Anti Kickback statute.

To avoid a question about our integrity, we must be able to identify and disclose potential conflicts, disclose them and withdraw ourselves from making decisions where it may appear that we are not being objective.

## **We Are All Required To:**

- Identify situations where it could appear to an outsider that your personal interests conflict with Tenet's interests.
- Disclose the situation to your manager and complete a Conflict of Interest Disclosure form.
- Withdraw yourself from making decisions that have the appearance of a conflict.

## **Examples of Potential Conflicts:**

- Employment with an entity that competes, contracts with or is a supplier of Tenet.
- A financial or ownership interest in an entity that competes with Tenet.
- Using Tenet property, information or position for personal gain.
- Taking for ourselves opportunities discovered through our jobs.
- Outside jobs or positions that conflict with our work at Tenet.
- Purchase for Tenet from someone you purchase from personally or vice versa.
- Buying from or making any business decision that involves friends or family.
- A supervisory or reporting relationship to family or those with whom we are personally involved.

# Care about Our Resources

Resources permit us to care for patients and operate our business. We eliminate wasteful spending, fraud and other concerns that deplete our resources. We ensure that our resources are used to support Tenet's mission and are utilized in ways that support our values and the interests of our shareholders.

## **We Are All Required To:**

- Protect Tenet assets and proprietary information.
- Communicate efficiently and effectively.
- Not trade on inside information.
- Refer media requests to the Communications Center.
- Retain documents as required.

## **We protect assets and information.**

We have an obligation to our shareholders to use our resources responsibly and only for Tenet's business purposes. We spend Tenet funds wisely and eliminate waste. We use Tenet's physical assets like computers, vehicles, machinery and work space for Tenet's business, and we protect these assets from loss, damage and theft. We don't waste supplies, equipment, space, capital or time. We also protect Tenet's non-physical assets like strategic plans, plans for acquisitions and divestitures, non-public financial information, trademarks, processes, know-how and other proprietary information. We keep information confidential and disclose it only to those who are authorized to know. We take precautions by avoiding discussions of sensitive matters over cell phones, password protecting computers and documents, and performing virus checks before downloading a file or installing a program.

## **We expect our vendors to follow these Standards.**

Vendors, suppliers, contractors, consultants, business partners and others with whom we do business are vital to our success. We expect them to adhere to these Standards and to always treat us with the same respect, fairness and professionalism that we demonstrate to them. If we entrust them with confidential information, we expect them to uphold that trust. We are careful about who we partner with. We look into the background of our vendors and confirm that they are not excluded from federal program participation before working with them. We pay only reasonable fees for services and we never engage consultants who make unrealistic promises. Our payments to vendors do not incentivize them to recommend practices that lead to excessive utilization or reimbursement. We do not allow others to use the Tenet name to advertise their products or promote their interests above the interests of Tenet or our patients. We will terminate our arrangements with vendors who do not follow our Standards of Conduct when working for Tenet.

## **We communicate wisely.**

We always communicate in an open, honest and respectful way, refraining from communications that are unprofessional or would be embarrassing if made public. It is generally acceptable to use telephones, email and the internet at work for personal purposes, but a manager or supervisor must approve, and the use must be appropriate (nothing offensive or inappropriate) and limited, taking up only a small part of work time without additional cost to Tenet. We also must remember that the company has an obligation to monitor email and internet use, sometimes without notice.

### **We communicate effectively.**

What we say and how we say it ultimately reflects on Tenet. That's why we ensure that all written and verbal communications – even emails – reflect the highest professional standards. We send messages only to those who need them, and we clearly state the purpose of the communication and what we seek in response. We think about the size and content of our emails to avoid wasting company resources with excessive distribution or attachments. We do not use aggressive language or tone in our communications and never write anything we would not want to read in the newspaper.

### **We do not trade on inside information.**

Inside information is information that is important enough to potentially affect a company's stock price but that is not yet public. Some examples of inside information are financial results, earning projections, changes in senior management, information about acquisitions, etc. If we have access to inside information about Tenet or one of our business partners, we may not trade in that company's stock until the information is made public. Nor may we "tip" others to do so. Trading on such information, or "tipping" others, is known as insider trading and is a violation of federal law. Contact the law department for additional guidance and restrictions.

### **We refer the media to Corporate Communications.**

In order to avoid confusion, Tenet communicates with the community in a clear, unified voice. Any media inquiries or requests to issue press releases or use our company logo should be referred to Corporate Communications at 469-893-2640.

### **We retain documents as required.**

We retain documents, email and other communications for the appropriate and legally required length of time described in Tenet's document retention policy. We never destroy documents before the permitted destruction date or if Tenet's law department has requested we retain them.

### **We care about our planet.**

We reduce our consumption of natural resources and our impact on the environment. We have an active recycling program and work to reduce our carbon footprint. We use electronic medical records that improve patient care and reduce waste. We ensure that we properly dispose of hazardous materials and that we maintain all certifications required to use such materials. We are proud to publish an annual sustainability report that describes Tenet's sustainability efforts – its environmental, social and economic footprint.



# Ethics and Compliance Support

## Tenet's Ethics and Compliance Department

Tenet has instituted some of the most rigorous standards for corporate governance, ethics and compliance – not just in our industry, but in all of corporate America.

Tenet's ethics and compliance program promotes open identification, discussion, reporting and resolution of ethics and compliance issues without fear of retaliation. We also openly communicate with the Office of Inspector General of the U.S. Department of Health and Human Services, pursuant to Tenet's Corporate Integrity Agreement, as well as communication with other state and federal regulators.

The ethics and compliance department is led by Howard Hacker, Tenet's chief compliance officer. Each of Tenet's hospitals has a dedicated hospital compliance officer who reports through a regional compliance director to the chief compliance officer.

For more information about Tenet's ethics and compliance program, visit Compliance Central on eTenet or Tenet's public Web site at [www.tenethealth.com](http://www.tenethealth.com).

## Contact Us

### Tenet Ethics Action Line

The Ethics Action Line is available 24 hours a day, 365 days a year. Callers to the Ethics Action Line may remain anonymous, and those who choose to give their names will have their identity protected to the extent allowed by law.

The Ethics Action Line can be reached in several ways:

Phone: 1-800-8ETHICS

Fax: 1-469-893-7341

Email: [ethics@tenethealth.com](mailto:ethics@tenethealth.com)

1445 Ross Avenue, Suite 1400  
Dallas, Texas 75202

## Other Resources

- Quality, Compliance and Ethics Committee of Tenet's Board of Directors: 1-800-8ETHICS
- Audit Committee of the Board of Directors (for reports about accounting, internal controls and/or auditing): 1-800-8ETHICS
- Ethics and Compliance Department: 469-893-6285
- Audit Services Department: 469-893-6915
- Human Resources Department: 469-893-2261
- Communications Center: 469-893-2640
- Government Relations Department: 469-893-2293
- Coding Compliance: 469-893-6285
- Patient Privacy and Security: 469-893-6285
- Billing Compliance: 469-893-6285
- Policies and Procedures: 469-893-6038
- Training and Education: 469-893-6748
- Law Department: 469-893-6632





Special thanks to Professor Marianne Jennings of the W.P. Carey School of Business at Arizona State University for her ethics training program that inspired many of the ideas in these Standards.

The quote about quality on page 3 has been attributed to many sources.

# Ethical Decisions Guide

Use this tool to assist you in making ethical decisions consistent with Tenet's values:

