



VISIONQWEST Healthcare GROUP

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SUBJECT: **CODE OF BUSINESS ETHICS & CODE OF CONDUCT**

POLICY NUMBER: VQ-SP-2001

LINE OF BUSINESS: GLOBAL POLICY (ALL BUSINESS LINES)

EFFECTIVE DATE: 11/21/11

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1. **Code of Business Ethics**

The first element of the Code of Business Ethics is putting the interests of the client facilities and ultimately the patient above our personal and individual interests. It is in the best interest of VisionQwest Healthcare to avoid conflicts of interest between the client, employees and staff.

VisionQwest Healthcare has developed corporate compliance guidelines to supplement and reinforce our client facilities' existing policies and procedures. It is also meant to assist VisionQwest Healthcare comply with all applicable laws, rules and regulations.

- All contractors / employees are responsible for conducting their jobs in a manner reflecting standards of ethics that are consistent with accepted criteria for personal integrity.
- Preserving VisionQwest Healthcare reputation for integrity and professionalism is an important objective. The manner in which contractors / employees carry out their responsibilities is as important as the results they achieve.
- All activities are to be conducted in compliance with both the letter of the law and spirit of the law, regulations, and judicial decrees.
- No contractor / employee should, at any time take any action on behalf of VisionQwest healthcare which is known or should be known to violate any law or regulation.
- Information about healthcare provider's medical condition and history is required during the hiring process. VisionQwest Healthcare recognizes this health information and electronic information must be held securely and in confidence. It is the policy of VisionQwest Healthcare that clinical staffs' specific information is not to be released to anyone outside of VisionQwest healthcare without a court order, subpoena or applicable statute.
- Marketing materials, regardless of medium, shall accurately describe the services, facilities and resources of VisionQwest Healthcare.
- To maintain high standards of performance, VisionQwest Healthcare contracts and employs only those individuals it believes are most qualified without regard to race, color, religion, sex, age, national origin, handicap or disability in compliance with all federal and state laws regarding discrimination.
- VisionQwest Healthcare is committed to maintaining a work place environment in which contractors / employees are free from sexual harassment.
- VisionQwest Healthcare will not tolerate violence or threats of violence in the workplace, including but not limited to abusive language, threats, intimidation, inappropriate gestures

- and/or physical fighting by any employee. These actions are strictly prohibited and may lead to severe disciplinary action up to and including termination.
- VisionQwest Healthcare recognizes that its contractors / employees and clinical staff are its most valuable assets and is committed to protecting their safety and welfare. Contractors / Employees are required to report accidents and unsafe practices or conditions to their supervisors or other management staff. Timely action will be taken to correct unsafe conditions.
 - Contractors / Employees that are licensed or certified in any profession shall follow all applicable rates and professional codes of conduct pertaining to that profession, in addition to the rules stated herein.
 - VisionQwest Healthcare prohibits the use or possession of illegal drugs and alcohol abuse on VisionQwest Healthcare property, a client property, or while engaged in company activity.
 - VisionQwest Healthcare is committed to providing initial and ongoing education for all employees regarding their responsibilities to uphold the code of business ethics and this set of VisionQwest Healthcare's Corporate Compliance guidelines.
 - VisionQwest Healthcare prohibits field staff to discuss bill rates of hospitals or special rates of VisionQwest healthcare with other healthcare providers.
 - VisionQwest Healthcare prohibits field staff to discuss personal or business affairs of any employee (field or office staff) with any individual not directly involved with the said personal or business affair.
 - VisionQwest Healthcare is committed to protecting the privacy, confidentiality and security of personal (education, employment and health) information of its contractors / employees. This policy is designed to assure compliance with applicable state and federal laws and regulations.
 - VisionQwest Healthcare is committed to protecting its own and its client's trade secrets, proprietary information and other internal information.
 - It is the desire of VisionQwest Healthcare to provide authorized third parties with information whenever requested while committing to our responsibility to control the release of information to protect the privacy and confidentiality of the contractor /employee and/or corporate information.
 - Contractors / Employees are not authorized to issue any statement, written or oral, to any news media representative or grant any public interview pertaining to the company's operations or financial matters.
 - Contractors / Employees are not allowed to enter into business arrangements or agreements with clients or their employees. At all times contractors / employees must maintain an arm's length relationship. At all times there must be a working environment where contractors / employees are not engaged in a business relationship that is not a part of their working relationship with VisionQwest and an agreement would harm the relationship between client and contractor / employee of the company.

Any contractor / employee that becomes aware of any ethical issues or unethical practices must immediately report it to their supervisor. If the supervisor is unavailable or you believe it would be inappropriate to contact that person, because of their involvement in the situation, you should immediately contact the VisionQwest Healthcare Corporate Office or any other member of management. Any contractor / employee can raise concerns and make reports without fear of reprisal or retaliation.

All reports and inquiries are handled confidentially to the greatest extent possible under the circumstances. You may choose to remain anonymous, though in some cases that can make it more difficult to follow up and ensure resolution to the situation.

VisionQwest Healthcare wants every employee to report violations of our ethical or other principles whenever you see them or learn about them. In fact, it is a requirement of your contract / employment. If you do not know whether something is a problem, please ask a member of management.

2. Standards of Conduct

It is the responsibility of every member of VisionQwest Healthcare's clinical field contractor / staff to exercise appropriate judgment, and conduct themselves in a manner that reflects the highest standards of professional and personal ethics and behavior.

The following set of standards, are to inform and guide, all contractors / staff assigned to work in client facility units. The guidelines below include but are not limited to the following:

- Patient care providers are to render care in a manner that enhances the personal dignity and rights of each patient. Any form of patient abuse and/or neglect will not be tolerated and patient care providers are to support VisionQwest Healthcare's policies and procedures in this regard.
- Interactions with all hospital patients, visitors, employees, physicians, vendors, etc., must be conducted in a courteous and professional manner at all times ensuring that VisionQwest Healthcare is always presented in the most favorable light.
- The practice of counseling of the patient regarding personal problems and/or participation of the VisionQwest healthcare patient care provider in conversations with patients about topics not relevant to the plan of care – is discouraged and unacceptable.
- Patients are to be dealt with equally and fairly and the selection of "favorites" is not acceptable.
- Appropriate language is to be used at all times when a VisionQwest Healthcare patient care staff member is at a VisionQwest Healthcare client facility, and in any patient care area private and/or public. Abusive, profane, threatening, demeaning, language resulting violation of HIPPA regulations or compromising patient confidentiality can result in immediate termination.
- Touching patients, except in the direct delivery of care or by a greeting, is prohibited.
- Socializing with patients and/or patient's significant others outside of the facility is unacceptable.
- Socializing with patient's and/or patients' significant others after discharge from the facility is prohibited. Contractors / Staff are not to call, date, nor develop personal or social relationships with patients, former patients, or family/significant others of patients, including giving of personal information or residential phone numbers. Contractor / Staff should discuss with their manager, any matter of concern regarding their contacts with current or former patient/family members of patient's significant others.
- All contractors / staff will uphold all rules and regulations related to patient confidentiality in all areas including patient care, public and non-patient care areas. These rules and regulations include but are not limited to the following:
 - a. Patient care providers are not to divulge to anyone any information or records concerning any patient without proper authorization. Unauthorized release of confidential information may constitute ground for termination and/or civil action.
 - b. Conversations regarding patients are not to be held in the presence of other patients of other patients or any other person not privileged to this communications.
 - c. Problems of a patient are not to be discussed with another patient.
 - d. Patients are not to be named or discussed with anyone in or outside of the facility who does not have the legal right to receive information about the patient.
- Personal problems, concerns or personal life information of patient care providers are not to be discussed with any patient, patient group or family/significant others.
- Contractor / Staff is not to discuss disagreements or criticize other patient care providers or physicians within the earshot of patients/families/significant others. A professional difference of opinion must be discussed in an appropriate private space.
- Behavior in patient areas and at the nurses' station shall be oriented toward patient care. Personal reading and conversations, including personal phone calls, are not to be conducted in these areas.
- Contractors / Employees must avoid any situation, which involves a possible conflict between their personal interests and those of VisionQwest Healthcare. Contractor / Staff shall not solicit, and are encouraged not to accept gifts or compensation of any kind from any individual or VisionQwest Healthcare outside of VisionQwest Healthcare as a consequence of their position at VisionQwest healthcare.
- Any inappropriate interactions between patients and contractor / staff, contractor / staff and staff, or contractor / staff and other within the facility will be met with investigation

and quick response within the framework of VisionQwest Healthcare policy and procedure.

- Contractors / Employees who are licensed or certified in any profession shall follow all applicable rules or professional codes of conduct pertaining to that profession, in addition to the rules stated herein.
- All VisionQwest Healthcare patient care contractors / staff will be expected to maintain English proficiency standards and use English exclusively during all paid working hours.
- VisionQwest Healthcare name badge must be worn at all times while on assignment, above the waist with contractors / employee's picture, name and title fully visible.
- While at the client facility, all contractors / employees must follow these basic rules:
 - a. Eating and drinking are only permitted in the cafeteria, designated employee lounges, unit conference rooms and in private offices, when not in use for patient care.
 - b. Sleeping is not permitted during paid working hours.
 - c. Personal phone calls on the unit during work time are prohibited, except in emergency situations.
 - d. Assigned duties must be carried out in a timely, efficient manner as directed or delegated.
- When entering a patient room and/or when greeting a patient, practice the following:
 - a. Knock before entering
 - b. Greet the patient by name.
 - c. If it is first contact of the day, introduce yourself by name and title.
 - d. Tell the patient why you are in the room.
- When exiting a patients room VisionQwest patient care staff is expected to:
 - a. Inform the Patient / Family that you are leaving.
 - b. State time you expect to return.
 - c. Ask if there is anything the patient/family needs before you leave.

