

## 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 personal and individual interests. It is in the best interest of IDR Healthcare ("IDR HC") and its employees to avoid conflicts.

IDR HC has developed these guidelines to supplement and reinforce our client facilities' existing policies and procedures and to comply with applicable laws, rules and regulations.

- All employees are responsible for conducting their jobs in a manner reflecting standards of ethics that are consistent with accepted criteria for personal integrity.
- Preserving IDR HC's reputation for integrity and professionalism is an important objective. The manner in which employees carry out their responsibilities is as important as the results they achieve.
- All activities are to be conducted in compliance with applicable laws, regulations, and judicial decrees.
- No employee may at any time take any action on behalf of IDR HC which violates any law or regulation.
- Information about a healthcare employee's medical condition and history is required during the hiring process. IDR HC recognizes this information must be held securely and in confidence. It is the policy of IDR HC that this specific information will not to be released to anyone outside of IDR HC unless in compliance with a court order, subpoena, or applicable statute.
- Marketing materials, regardless of medium, shall accurately describe the services, facilities and resources of IDR HC.
- To maintain high standards of performance, IDR HC 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, state, and local laws regarding discrimination.
- IDR HC is committed to maintaining a workplace environment in which employees are free from sexual harassment.
- IDR HC 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.
- IDR HC recognizes that its employees are its most valuable assets and is committed to protecting their safety and welfare. 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.
- Employees that are licensed or certified in any profession shall follow all applicable rules and professional codes of conduct pertaining to that profession, in addition to the rules stated herein.
- IDR HC prohibits the use or possession of illegal drugs and alcohol on IDR HC property or while engaged in company activity.
- IDR HC is committed to providing initial and ongoing education for all employees regarding their responsibilities to uphold this code of business ethics.
- IDR HC prohibits employees from discussing Facility bill rates or rates charged by IDR HC to Facilities.
- IDR HC prohibits employees from discussing personal or business affairs of any other employees unless personally involved in such personal or business affairs.
- IDR HC is committed to protecting the privacy, confidentiality and security of personal (education, employment and health) information of its employees. This policy is designed to assure compliance with applicable state and federal laws and regulations.
- IDR HC is committed to protecting its own and its client's trade secrets, proprietary information and other internal information.

• 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.

Any 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 IDR HC Corporate Office or any other member of management. Any 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 of the situation.

IDR HC 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 employment. If you do not know whether something is a problem, please ask a member of management.