



ATC TRAVELERS CODE OF ETHICS

ATC Travelers' Code of Ethics: for review by all staff and to be shared in HCA orientation and Client orientation.

ATC Travelers has an open door policy encouraging dialogue between management, employees and clients. We foster an open forum for the discussion of conflicts, ethics and compliance. We equally value our employee and client relationships and realize each groups' critical nature to our business and its success.

All employees have an obligation to report incidents they feel are unethical or illegal or are in violation of ATC Travelers' policies and client facility policies. Healthcare workers are advocates for patients and their rights.

If an employee believes another employee has violated or may violate any law or ATC Travelers policy, they must report this information immediately to a work site supervisor. If the employee is not comfortable reporting the matter to their work site supervisor, the employee may also call ATC Travelers during business hours or the Director Risk Management at any time. By raising concerns, you allow management the opportunity to address actual and potential problems and concerns. Good faith reports of unethical, or suspected illegal conduct is protected and not subject to retaliation.

Fair Treatment: ATC Travelers will maintain an atmosphere of fairness and integrity in all professional interactions. ATC Travelers is committed to providing a workplace environment that promotes diversity and is free from prejudice and discrimination.

Mutual Respect: ATC Travelers will maintain a workplace that is free from harassment and where all employees are treated with respect.

Health & Safety: ATC Travelers will seek to provide a clean, safe and healthy place to work. In order to maintain the safety of others, all employees have a responsibility to report to work free from the influence of any substance that could prevent them from conducting work activities safely and effectively. Furthermore, any threats or intimidation or the possession of firearms is expressly prohibited in ATC Travelers corporate office and at any client facility. We recognize our own and client facilities' obligations to maintain and promote workplace safety and have developed policies to protect everyone from potential workplace hazards. If your work with a client facility involves the use of hazardous substances, follow the rules governing their use, storage

and disposal. If you see a situation or condition which you think may be potentially damaging to the environment or poses a safety hazard, advise your work site supervisor so that the situation can be corrected.

Probation and Performance Evaluation: All employees are subject to performance evaluations. Performance is evaluated on the basis of the following: reliability, cooperation, attendance, skill proficiency, appropriate appearance and supervisory ability, if applicable. ATC Travelers employees work under the direct supervision of the work site supervisors in client facilities. As such, ATC Travelers must rely on them for input regarding employee performance. Such input is sought at the at the end of each assignment. Any comments regarding performance will be documented in the employee file. Matters that require documentation and/or corrective action to be entered in the employee's file are outlined in the Employee Handbook.

Professional Conduct: ATC Travelers is committed to providing our clients with qualified, professional healthcare personnel to fill their staffing needs. We rely on our clinical employees to fulfill this commitment, as such ,we have established and outlined a professional conduct policy in the Employee Handbook.

Drug Free Workplace: ATC Travelers is committed to providing a safe work environment for our employees and maintaining a drug free workplace. As a condition of employment, each employee must sign a copy of the company's official Drug Free Workplace policy. To protect the safety and welfare of our clients' patients and colleagues, all employees are expected to be free of the influence of alcohol and illegal drugs when performing their assignments. If you report to work under the influence of an illegal drug or alcohol, have an illegal drug in your system, abuse prescription drugs or possess or sell illegal drugs while on a job assignment, you may be subject to immediate termination.

Prescription drugs and controlled substances may only be administered by physician order and must be properly documented in the client facilities' medical records. It is strictly prohibited to divert drugs away from client facilities or to administer them improperly. If you become aware of a potential lapse in security or the diversion of drugs in your place of assignment, report the incident immediately to the client supervisor and to ATC Travelers.

Harassment/Discrimination: Each of us has the right to work in an environment free of harassment. We will not tolerate any form of harassment or discrimination based on our employees' diverse characteristics or cultural backgrounds. Degrading or humiliating

jokes, slurs, intimidation and verbal or physical conduct of sexual nature that interferes with an individual's work performance or creates a hostile or offensive environment has no place at ATC Travelers and is prohibited.

Workplace Violence: Fighting, stalking, violation of a restraining order, terrorism or hate crimes or threats of violence, whether directed at co-workers, patients or visitors, is strictly prohibited. Anyone who reports to work with guns, knives or other weapon is subject to immediate dismissal and possible legal action.

Company Assets: All ATC Travelers employees will be responsible for safeguarding the company's assets, including time, materials, supplies, equipment and information, and for using company assets for business-related purposes. Occasional use of such items as copying facilities or telephones, where the cost to ATC Travelers is insignificant, is permitted. Any unauthorized use of company resources for personal financial gain unrelated to ATC Travelers business is strictly prohibited and may lead to disciplinary action.

Software and Intellectual Information: Honor copyrights and software license agreements. Don't copy software or copyrighted documents not authorized for reproduction. Make sure that any software you purchase for your home computer is not copied into work you do for ATC Travelers or installed into your office computer and vice-versa.

Electronic Media: All company communication systems, including e-mail, Internet access and voice mail, are the property of ATC Travelers and are to be used for business purposes. You may use our communications systems for personal business on a limited basis, but be aware that these communications are not private. It is prohibited to use the company communications channels or Internet access to post, store, transmit, download or distribute materials that are threatening, knowingly or intentionally false, obscene, harassing or something that may give rise to a civil liability or criminal offense. These channels of communication may not be used to send chain letters, personal broadcast messages or copyrighted documents not authorized for reproduction, nor used to conduct a job search or open misaddressed mail.

Protection of Company Information: Employees will at all times during the period of their employment and thereafter keep in confidence all confidential information. The specific materials, information, products, designs, plans, ideas, documents and data of

ATC Travelers' customers shall also be treated as confidential. ATC Travelers recognizes the importance of safeguarding the privacy of all patient information and that this information should always be treated according to applicable laws federal and state laws. Information about our strategies, operations, clients, client's patients and personnel is confidential and should be protected. Do not disclose confidential information to others outside of ATC Travelers unless the individuals have a legitimate need to know and have agreed to maintain the confidentiality of the information. Under no circumstances may you use confidential information for your personal benefit, even after you leave your job at ATC Travelers. Breach of this policy may lead to immediate dismissal and other appropriate actions.

Patient Care and Confidentiality: Our patients expect their confidentiality and right to privacy to be protected. Releasing patient-specific information to unauthorized individuals or discussing such information in elevators and other public areas is prohibited by both ATC Travelers and client facilities. Do not share patient-specific information with any employee, affiliated physician or colleague other than that necessary for the individual to perform his or her job. Make sure patient information is properly safeguarded. Patient information may only be released according to facility client policies and procedures. Breach of this policy may result in immediate dismissal and other appropriate actions.

Coding and Billing for Services: Services rendered by our healthcare providers to our client facilities must be based on real and rendered service. All bills submitted to our clients should be accurate and complete, reflecting actual services rendered. It is prohibited to present false, fictitious or fraudulent claims for payment. Breach of this policy may result in dismissal and all other appropriate actions.

Fraud and Abuse: It is prohibited for any ATC Travelers employee to solicit or receive anything of value, either directly or indirectly, in exchange for a job placement, favor to a healthcare provider or for business generated from the company.

Relationships with Suppliers: Our suppliers, subcontractors and service providers are to be selected on objective criteria, including quality, service, price, delivery capability and technical excellence. Personal relationships and friendships play no part in the selection process. Accepting bribes or kickbacks is strictly prohibited. As a general rule, do not accept gifts or favors from individuals or companies with whom ATC Travelers does business. Token presents or gifts with a total value of \$50.00 or less are

permitted, but you may not accept cash or cash equivalents, such as gift certificates, from anyone, including our own healthcare providers and employees. Under no circumstances may you solicit a gift. Never accept any gift, no matter how low in value, if it would influence your business judgment.

Conflicts of Interest: A conflict of interest may arise if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities, or the demands of your outside activities hinder or distract you from performing your job. It is your responsibility to ensure that you remain free of conflicts of interest, and to disclose any financial interest you or members of your immediate family have in an entity that does business with ATC Travelers.

Marketing and Advertising: All marketing and advertising materials must be truthful, fully informative, non-deceptive, and accurately describe our offer of professional services, their attendant risks and licensures and certifications.

Political Activities: We encourage our employees to participate in the political process, but such participation must be on your own time and expense. You may not use company time or resources to support your political activities.

ATC Travelers challenges our employees to act responsibly and ethically by recommending they ask the following questions as a guide to help them make ethical decisions: Am I uncomfortable with a particular action? Would I be embarrassed to discuss my action with family and friends? Could someone's life, health or safety be endangered by my action? Could my action appear improper to others? Have I witnessed an action, which I believe violates the law or an ethical standard?

Failure to comply with legal, ethical and moral standards may result in serious consequences, both to you personally, and to ATC Travelers. Adhering to our standards ensures that ATC Travelers carries on its mission of providing quality healthcare service within the highest moral, ethical and legal standards.