



***Our Commitment to  
Do the Right Thing***

# **OUR CODE OF CONDUCT**

JULY 2015



## TABLE OF CONTENTS

A. Our Code of Conduct: <i>Overview</i> .....	3
B. Our Chief Executive Officer’s Message.....	4
C. Our Standards of Business Conduct: <i>8 Standards that Guide our Conduct</i> ....	5
1: <i>We Serve our Customers with Quality Care and Service</i> .....	6
2: <i>We Provide our Associates with the Right Work Environment</i> .....	7
3: <i>We Operate with Integrity in our Business Dealings</i> .....	9
4: <i>We Act in Compliance with the Law</i> .....	10
5: <i>We Compete Vigorously in the Marketplace</i> .....	12
6: <i>We Avoid Conflicts between our Personal and Professional Interests</i> .....	14
7: <i>We Protect Company Assets and Information</i> .....	16
8: <i>We Do the Right Thing</i> .....	18
D. Our Code of Conduct: <i>Conclusion</i> .....	19
E. Employee Certification and Agreement.....	20

Throughout *Our Code of Conduct* (or “*Our Code*”), the terms “our Company”, “we”, “our”, and “us” refers to TridentUSA Health Services (“Trident”) and the Trident family of companies, including but not limited to:

- **Diagnostic Laboratories and Radiology,**
- **MobilexUSA,**
- **Rely Radiology,**
- **TridentUSA Mobile Clinical Services,** and
- **US Laboratories.**

In addition, the term, “Associate”, refers to managers, officers, employees, contractors and volunteers of Trident and our affiliated business units; and the term, “Customer” refers to patients, health care providers, facilities and any others for whom our Company provides our tests, exams and/or services.

To assist us in understanding *Our Code*, two symbols or icons are used throughout the document to indicate special information. The “” icon indicates a **Do the Right Thing - Alert** that directs us to important information that should be noted, while the “” indicates a **Do the Right Thing - Question and Answer** that will address a commonly or frequently asked question about the surrounding topic.

## A. Our Code of Conduct: *Overview*

*Our Code of Conduct* states the values upon which our Company is based and provides the fundamental responsibilities that each Trident Associate is expected to maintain.

We value doing the right thing.

At Trident, we have an opportunity to become the leading provider of ancillary services, including mobile diagnostic (x-ray and ultrasound) and clinical laboratory services for long-term care and alternate site markets, in the country. What we do as Trident Associates in our daily business activities defines who we are as a company. Doing the right thing is how our Company will grow into a great company.

We provide this, *Our Code of Conduct* (“*Our Code*”), to express our expectations and responsibilities for doing the right thing in our daily business activities by applying appropriate ethical and legal standards to our conduct.

*Our Code* applies to all Trident Associates. Therefore, each Trident Associate must comply with the responsibilities summarized in *Our Code*, as well as the general intent of the responsibilities.

Although *Our Code* outlines the conduct required of our Associates in many circumstances, it cannot provide specific direction for handling every situation that our Associates encounter. For this reason, more detailed guidance is provided in our Company programs, policies and procedures.



### **Do the Right Thing – Alert**

If at any time an Associate has a question or concern regarding *Our Code*, the Associate is expected to speak up and ask their local management, Business Unit Health Care Compliance and Privacy Leader (“BUCL”), or our Corporate Health Care Compliance and Privacy Officer (“CCO”) for more information and assistance. Associates may also contact our **Ethics and Compliance Hotline** by phone at **(866) 654-6699** or online at **[www.tridentusa.alertline.com](http://www.tridentusa.alertline.com)**.

## B. Our Chief Executive Officer's Message:

Dear Trident Associate,

TridentUSA Health Services is the leading national provider of mobile imaging, laboratory and clinical services to the long term care industry. It is our intention to be a world-class company on a continuing journey of growth and sustainability.

This is an exciting time in our company. As Trident Associates, we each have a unique opportunity to affect how our company continues to develop. More than that, each of us plays an integral part in ensuring that we deliver quality and responsive care to our patients and customers. Every day, we carry the responsibility of providing quality, integrity and safety in all that we do. Our company relies on us and that reliance carries with it the responsibility to do the right thing.

We have developed *Our Code of Conduct* as our written expression of the high standards we all have long practiced. Having a code of conduct does not mean we have a problem. To the contrary, *Our Code of Conduct* expresses how seriously we take ethics and compliance. *Our Code of Conduct* is our statement of what we believe in and the way that we work. *Our Code of Conduct* is the foundation of what we do. It helps us recognize issues that impact our services, our company and our actions. *Our Code of Conduct* is a resource that guides us to take appropriate actions with confidence. *Our Code of Conduct* is the framework that we can reference as we do the right thing.

It is by doing the right thing that we continue to grow.

No code of conduct can provide an answer for every situation or question. So when situations or questions not directly or generally covered in *Our Code* arise, we are counting on you to help our company do the right thing by asking questions or getting help. Ask your supervisor for assistance. Call your local Business Unit Compliance and Privacy Leader for guidance. Call the Trident Ethics and Compliance Hotline to report your concerns.

You are critical to our company's success. Please help us uphold the standards expressed in *Our Code of Conduct*. Together, we set the right example, both as individuals and as Trident.

Thank you for your commitment and hard work.

Mark Parrish  
Chief Executive Officer

## Our Standards of Business Conduct

**1. *We Serve our Customers with Quality Care and Service.***

We focus on serving our customers with high quality of care and customer service, while always respecting patient rights and dignity.

**2. *We Provide our Associates with the Right Work Environment.***

We provide a fair, diverse, safe and responsible workplace that encourages our Associates to grow, produce and lead.

**3. *We Operate with Integrity in our Business Dealings.***

We conduct our activities with integrity in every aspect of our business dealings.

**4. *We Act in Compliance with the Law.***

We act in compliance with the laws that govern our business and the services we provide.

**5. *We Vigorously Compete in the Marketplace.***

We vigorously compete for business in the marketplace with hard work, skill and fairness.

**6. *We Avoid Conflicts between our Personal and Professional Interests.***

We keep our personal activities and interests separate from our business duties and responsibilities.

**7. *We Protect Company Assets and Information.***

We protect our Company assets including information related to our Customers and business partners.

**8. *We Do the Right Thing.***

We do the right thing when questions and concerns arise, and when the answers aren't clear, by speaking up and seeking guidance.

## **Standard 1: *We Serve our Customers with Quality Care and Service.***

*We focus on serving our customers with high quality of care and customer service, while always respecting patient rights and dignity.*

### **Our Expectations**

We expect our Associates to do the right thing in the performance and support of our diagnostic and clinical tests, exams and services.

In long-term care, physicians and nonphysician practitioners order tests, exams and services in order to gain much needed information for the proper care and treatment of often frail, elderly and disabled patients. Our nursing home and other Customers call on us to perform these critical tests, exams and services because they trust our ability to perform these services in a timely, courteous, accurate and ethical manner. Our overall service to our Customers is vital in informing the continued care and treatment of these vulnerable patients.

### **Our Responsibilities**

At Trident, each of us is responsible to ensure that we provide quality care and service to our Customers.

#### **Quality Care**

We must ensure that our tests, exams and services are conducted by properly credentialed, licensed and/or certified Associates that are appropriately trained. Our Associates must be screened to ensure that they are in good standing with federal, state and private bodies to perform our tests, exams and services.

When interacting directly with patients, we are each responsible to treat all patients with courtesy, professionalism and respect. Our Associates must provide a consistent level of care to all patients regardless of race, color, religion, sex (including pregnancy), national origin, age, disability, genetic information or any other personal characteristic. We must recognize that patients have the right to consent to or refuse care and we must avoid even the appearance of physical or mental abuse, neglect, exploitation or mistreatment of a patient.

We should be vigilant when we have access to patients' personal property and information. We must avoid even the appearance of theft, damage or misuse of patients' personal property. We must also limit the use and disclosure of patient medical and other personal information to only those who need to know this information.

#### **Customer Service**

It is our responsibility to provide our diagnostic and clinical tests, exams and services to patients only in response to an appropriate physician's or nonphysician practitioner's order. To support our tests, exams and services, we must maintain accurate records and documentation of our clinical and technical activities. Additionally, we should offer our Customers open lines of communication so that we may receive and review any questions, concerns or complaints they might have regarding our care or service.

## **Standard 2: *We Provide our Associates with the Right Work Environment.***

*We provide a fair, diverse, safe and responsible workplace that encourages our Associates to grow, produce and lead.*

### **Our Expectations**

We expect our Associates to be treated with fairness, dignity, and respect in a safe and healthy environment.

As Associates, we expect an inclusive and diverse work environment where we each have an opportunity to grow and develop professionally. We all benefit when we work as a team where our ideas are heard and considered. We also expect that we will each do our part to keep our workplace free from health and safety hazards. Our safety and health at work depends on each of us doing the right thing by using common sense and taking necessary precautions in our daily activities.

### **Our Responsibilities**

#### **Discrimination**

We prohibit any form of discrimination or harassment against any Associate or job applicant because of race, color, religion, sex (including pregnancy), national origin, age, disability, genetic information or any other personal characteristic that is protected by law or unrelated to job requirements.



#### **Do the Right Thing - Question and Answer:**

**Q:** My supervisor seems to treat some Associates in my department better than other Associates because of their gender. What should I do?

**A:** If you feel comfortable, talk with your supervisor about the issue. If you are not comfortable speaking with your supervisor about this issue, you must contact your Human Resources representative for assistance. You may also contact the **TridentUSA Ethics and Compliance Hotline** to report your concerns and to seek resolution.

#### **Safety, Health and the Environment**

We will keep our work environment safe and healthy through our compliance with relevant laws and requirements. To do this, we will develop and follow internal safety and health programs and standards that will include training and education for our Associates.

All Trident Associates are responsible to participate in our health and safety programs by:

- Reporting to work and conducting all work-related duties free from the influence of drugs and alcohol.
- Following all operating instructions and exercising caution when using equipment.
- Confirming that required maintenance is performed before using any equipment.
- Adhering to our local business unit fleet and driving requirements.

- Reporting work-related injuries or illnesses to management and/or our local Human Resources representative, as appropriate.
- Being aware of work place and surrounding environment and taking steps necessary to secure personal safety and company assets, as appropriate.
- Understanding and following all applicable safety and emergency procedures as required for carrying out their job responsibilities.



### **Standard 3: *We Operate with Integrity in our Business Dealings.***

*We conduct our activities with integrity in every aspect of our business dealings.*

#### **Our Expectations**

We expect our Associates to conduct our business with integrity at every level of our Company.

Our Customers and other business partners expect us to fulfill our obligations in compliance with the law, our agreements, policies and standards. Therefore, when an Associate records, types or takes an order from one of our Customers, we expect the Associate do so accurately. When we perform a test, exam or service, we expect our Associates to do so with technical skill and expertise. When we respond to requests from our Customers and other business partners, we expect our Associates to do the right thing and provide clear information. This is how we earn the trust of our Customers and other stakeholders.

#### **Our Responsibilities**

Our Associates must act within the limits of their job requirements and responsibilities. Only specifically designated Associates are permitted to enter into agreements on behalf of our Company. Designated Associates must act in good faith when entering into and executing business agreements. All agreements should be accompanied by written documentation that includes the purpose of the agreement, provisions that govern our relationship, and other terms and conditions as required by our Company policies. In our transactions and interactions with our business partners, we will carry out our commitments with skill and fairness.

Only designated Associates may respond to requests for information from external entities, including government and regulatory authorities, legal counsel and the media. Designated Associates will provide full, accurate, timely, and understandable information when required to make statements or disclosures, or to file reports related to our business.

We will not conceal any inaccuracies made in our Company's reporting or filing activities, but we will fully disclose and correct, as promptly as possible, any uncovered errors.

## **Standard 4: *We Act in Compliance with the Law.***

*We act in compliance with the laws that govern our business and the services we provide.*

### **Our Expectations**

We expect our Associates to understand and comply with the laws and other requirements that govern our business and the Associate's role in our Company.

At Trident, we are subject to many laws. Various medical, environmental, safety, health, labor, financial and other laws regulate our business activities. Our internal programs, policies and procedures help and guide our Associates to meet the requirements of these laws. One such program is our Health Care Compliance and Privacy Program ("Compliance Program"). We expect our Compliance Program to facilitate our doing the right thing by detecting, preventing and correcting conduct that violates health care fraud, waste and abuse laws and requirements.

### **Our Responsibilities**

#### **Kickbacks and Patient Referrals**

We will not make any offer that is intended to influence anyone to recommend or purchase tests, exams or services from us or in return for referrals for our services that may be reimbursed by Medicare, Medicaid, or any other government health care programs.

We will not pay or offer to pay anyone for the referral of patients. Also, we will not solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. In the event that we make a patient referral to another healthcare provider, we will not take into account the volume or value of referrals that the provider has made, or may make to us.



#### **Do the Right Thing - Question and Answer:**

**Q:** A Trident Associate has been asked by staff at a Customer nursing facility to perform certain clerical activities that are not related to our diagnostic or clinical services, free of charge. If the Associate were to perform these services, free of charge, could these activities violate the law or our Company standards?

**A:** Yes. Since the clerical activities are not directly related to our tests, exams or services, these activities could be viewed as free services that we are performing in order to provide a benefit to the nursing facility in return for patient referrals to our Company. These activities might violate a federal law known as the Anti-kickback Statute. They may also violate our Company standards.

As a Trident Associate, if you are asked by Customer staff to perform services that are not directly related to our tests, exams or services, please contact your manager, the local Business Unit Compliance and Privacy Leader or our Corporate Compliance Officer for guidance.

## Physician Interactions

We will not participate in activities that support a physician's referral of patients for service to an entity that the physician or the physician's immediate family member owns. Additionally, we will not enter into any transaction that allows a physician to resell our services. We will advise any physician with whom we enter into a contractual agreement of our standards prior to final execution of our agreements.

## Claims Submissions

We will not knowingly present, or cause to be presented, claims for payment or approval which are false, fictitious, or fraudulent. To ensure accurate billing in support of our claims, our patient files and supporting records will provide reliable documentation of the tests and exams ordered and the services we rendered.



### Do the Right Thing - Question and Answer:

**Q: If a newly acquired company provides claims information to us that appears to include unclear or ambiguous diagnosis codes, should this company's claims submission activities be reviewed before it is submitted for payment?**

- A. Yes. It may be that a mistake has occurred in the documentation of claims information at the acquired company's billing office. However, as the new owner, it is our responsibility to be diligent in submitting accurate information for billing. Our coding and billing Associates must review all claims. We must also ensure that our internal policies and processes are followed at the acquired company in order to address any potential errors prior to submitting claims for payment.

## Gifts and Gratuities

We will not attempt to unlawfully influence any individuals or entities through any activities, including the offering or receipt of business courtesies such as gifts, gratuities, favors, or the granting of other advantages. We must not offer or receive a gift or gratuity that is valued above the limits set by our Company guidelines. In our interactions with external parties, we must not offer or receive any gift or gratuity in the form of cash or a cash equivalent, such as gift certificates or gift cards. Also, we must not offer or receive a gift or gratuity that is meant to influence the recipient's judgment or secure preferential treatment to or from a business partner. Our Associates are prohibited from offering any gift, gratuity, favor or any other business courtesy to any government official, employee, other personnel or contractor.

## Meals and Entertainment

We must limit the circumstances in which we participate in meals and entertainment with and for our business partners including current and prospective customers. We prohibit business meals and entertainment that are not directly related to Trident business, tests, exams and services. Costs, locations and participation in business meals and entertainment must be within established company guidelines and must not in any way appear to be offered to imply that the business partner is obligated to our Company.

## Charitable Contributions

Within the limits set by our Company guidelines and practices, we may provide monetary support to publically promoted charitable efforts, in the communities that we serve, in furtherance of good will and good causes.



### Do the Right Thing - Question and Answer:

**Q:** I want to do something nice for one of my customers. I saw a holiday fruit basket that I would like to send to them, but it costs \$400. Is it appropriate for me to offer this gift to them as a business courtesy?

**A.** No. Since the value of the gift is outside our Company guidelines and the recipient might consider the gift to be very generous and therefore feel compelled to return the favor, the Trident Associate is not permitted to purchase and offer the holiday fruit basket to the customer.

If an Associate has any questions about a gift, gratuity or other business courtesy, please contact the local BUCL, our CCO, or General Counsel before proceeding.

## Education and Training

To ensure that we know and understand our responsibilities, and the rules, standards and principles that guide our activities and operations, all Trident Associates must attend and complete required compliance, privacy and job-specific education and training, as assigned. All Trident managers and supervisors are responsible to ensure that each Associate in their departments, teams or groups comply with our education and training requirements. Any Associate, manager or supervisor who fails to comply with this requirement will be subject to disciplinary action, up to and including termination, in accordance with our Company policies.

## **Standard 5: We Compete Vigorously in the Marketplace.**

*We vigorously compete for business in the marketplace with hard work, skill and fairness.*

### **Our Expectations**

We expect our Associates to promote our Company and compete for business diligently using their individual business experience, knowledge, ability and good judgment.

We operate our business in a highly regulated industry. Certain activities that may be acceptable in other businesses are not acceptable business practices for us. We expect our Associates to understand the responsibilities we have and do the right thing by promoting our Company and competing for business in accordance with our standards.

### **Our Responsibilities**

#### **Conduct in the Marketplace**

We will be truthful about the performance and value of the services we offer our current and potential Customers. We will keep our promises and commitments to our Customers, suppliers, governmental agencies and other contractual partners.

#### **Competition in the Marketplace**

The conduct of business in the U.S. is subject to many federal and state legal requirements. We will implement our antitrust and fair competition programs and policies to ensure our compliance with these requirements.

**Standard 6: *We Avoid Conflicts between our Personal and Professional Interests.***

*We keep our personal activities and interests separate from our business duties and responsibilities.*

**Our Expectations**

We expect our Associates to ensure that their personal activities and interests do not affect their business judgment or activities for Trident.

Trident Associates are each entrusted with the duty to act in the best interest of our Company. Trident Associates should not allow their personal, social, financial, political or other interests to influence their business judgment and activities. Our stakeholders count on us to conscientiously work on behalf of Trident by taking our business activities seriously and keeping them separate from other activities and interests that we may have.

**Our Responsibilities**

We must avoid situations where our personal, social, financial, or political activities or interests have even the appearance of a conflict with the best interest of our Company. Trident Associates must avoid, discontinue and report activities including the following:

- Directing Trident business to, or doing Trident business with, a company or supplier that is owned or managed by the Associate, or a relative or close friend of the Associate.
- Being involved in or making an employment related decision about a relative or close friend.
- Using your position to secure a gift, discount or favor from a current or potential business partner that is in violation of our Company policies, or is not available to all Associates or the public.
- Doing part-time work for a customer or business partner, or work that interferes with assigned Trident duties or work-hours, or work that requires the use of Trident equipment.
- Investing in real estate, intellectual property rights or businesses of interest to Trident.



**Do the Right Thing - Question and Answer:**

**Q: My sister owns a company that provides a service that may improve our Company’s performance for our Customers. My department is responsible for providing that service to our customers. Can I enter into a contract with my sister’s company for the service or recommend her for the service?**

A. No. You should not be involved in the hiring of your sister’s services with our Company. You must disclose your personal relationship to you supervisor, and remove yourself from any involvement in the selection process. You may also contact your BUCL or our CCO for further guidance and assistance.



### **Do the Right Thing – Alert**

At times, we may not be sure whether a conflict of interest exists. When we are uncertain whether our activities and interests conflict with our responsibilities as Associates of Trident, we must seek assistance and guidance from our management, BUCL or CCO for further direction.

## **Standard 7: *We Protect Company Assets and Information.***

*We protect our Company assets including information related to our Customers.*

### **Our Expectations**

We expect our Associates to protect our Company's assets and information, including our property, equipment, documents, records, trade secrets, and other information, from loss, misuse, theft and unauthorized access.

To perform our duties, we are provided and given access to our Company's assets and information. Our Company trusts us to use these assets and information for legitimate business purposes. We do the right thing by using company property and information only for business purposes, except for minimal and incidental personal use.

### **Our Responsibilities**

#### **Company Assets and Information**

We will use our Company's property, assets and information for legitimate business purposes. This includes but is not limited to our Company's real estate, equipment, resources, vehicles, trade secrets, intellectual property, budgets, plans, information systems (such as desktop computers, laptop computers, USB or thumb drives, postal mail, electronic mail, printers, copiers, telephones, mobile phones, and air cards), office supplies and other assets and information. We must limit our use of these items for personal use in accordance with company policy and guidelines. We will not use our Company property for soliciting outside or personal, social, financial, religious, or political causes or other non-company sponsored, charitable or community activities.

We will, in accordance with our Company guidelines, inventory and inspect our property to review the appropriate functioning, maintenance and adherence to our standards. In addition, we will collect and maintain electronic records of usage or access to our property to minimize and detect unauthorized access, use, intrusion and disclosure of our information, including information related to our Customers.

#### **Confidential and Restricted Information**

We will safeguard confidential and restricted information as classified by our Company policies and guidelines. We will limit our use and disclosure of any information that we maintain that is not available to the general public, or as required by agreement, law, regulation or our Company standards. We will not use or disclose any health, medical, financial or other personal information that we maintain about a patient, Associate or other individual without the explicit written consent of the subject of the information, or as required or permitted by law.



### **Document and Information Retention**

As Associates of Trident, we will not intentionally or recklessly destroy any company documents or information in violation of the law or our Company standards. All paper and electronic information and documents will be maintained and retained in accordance with the minimum period of time required by law, regulation or our Company standard. We will all take steps to preserve our Company information, especially as directed by law, regulation and/or our General Counsel.

### **Intellectual Property**

Our Company's logos, secrets, inventions, technologies, software, improvements, patents, innovative ideas and strategies, copyrights, trademarks, and other intellectual property belong to Trident. We must protect our intellectual property by keeping vital company information within our Company and by following our policies and requirements.

When we, as Trident Associates, participate in the creation of intellectual property, we understand that it becomes the property of Trident. Therefore, we must promptly disclose to our General Counsel any intellectual property that we create during our employment with Trident so that any legal rights, options and concerns may be considered and determined.

## **Standard 8: *We Do the Right Thing.***

*We do the right thing when questions and concerns arise, and when the answers aren't clear, by speaking up and seeking guidance.*

### **Our Expectations**

Now that we have reviewed *Our Code of Conduct* and we have read each of the proceeding seven (7) Standards of Business Conduct, we come to the final standard, **We Do the Right Thing.**

We expect our Associates to do the right thing at all times.

*Our Code* addresses important questions. Sometimes the answers are not clear or as clear as we'd like. Occasionally, we may not be sure how to answer the questions and concerns that arise during our daily activities. We may encounter occasions when we believe that someone acting on behalf of our Company is doing or may be about to do something that violates the law, *Our Code*, our policies or other standards. We may even encounter occasions when someone asks us to do something that we are not comfortable doing. When those times arise, it isn't always clear how to act, but at those times, doing the right thing requires us to speak up, seek assistance and report the information to management, Human Resources, the local BUCL, our CCO, and/or our General Counsel.

It's not always easy to speak up, but it is always the right thing to do.

### **Our Responsibilities**



#### **Do the Right Thing –Alert**

Whenever the application of a law, rule, regulation or our Company standard is uncertain, we must do the right thing by speaking up, asking questions and reporting our concerns. We should ask our knowledgeable peers, management, BUCLs and our CCO for assistance. Along with leaders, we will work together to use all appropriate resources, including our General Counsel, to answer questions, provide appropriate guidance and act in compliance with the requirements

We must take our responsibility to do the right thing seriously. Whenever we have a question or concern, the following steps must be followed:

1. All Associates must:
  - a. Be sure to know all the facts and what activity is being proposed.
  - b. Get help or advice from:
    - i. A knowledgeable peer;
    - ii. Their manager, supervisor or other leader; and/or
    - iii. Their Human Resources representative, Business Unit Health Care Compliance and Privacy Leader (BUCL), Corporate health Care Compliance and Privacy Leader (CCO) or General Counsel.
  - c. Once the answer is received, resume normal business duties and responsibilities.

2. Each manager, supervisor or Leader must:
  - a. Communicate that you agree with and stand by *Our Code*.
  - b. Encourage behavior that complies with *Our Code*.
  - c. Get back to the Associate with answers to their question or concerns.
  - d. Resume normal business duties and responsibilities once answer is delivered.
  - e. Not retaliate against any Associate who speaks up, asks questions or reports suspicions.

Associates should not be afraid to speak up, ask questions or report their suspicions. We prohibit any form of retaliation against any Associate who complies with our requirements to speak up, ask questions and report suspicious activity or misconduct. Any Associate who participates in any retaliatory action associated with the reporting of alleged misconduct will be terminated, in accordance with our Company standards.

## **D. Our Code of Conduct: *Conclusion***

*Our Code of Conduct*, Standards of Business Conduct, Compliance Program and other programs and policies are designed to equip us to do the right thing in every facet of our jobs. By following our standards, we will become a company that other companies will choose to emulate. Our commitment to do the right thing and focus on producing quality customer care and service are at the center of our continued strong and sustainable performance.

By Doing the Right Thing, we become a great Company, together.

## Associate Certification and Agreement

As an Associate of TridentUSA Health Services and affiliated business units, I will:

1. Review *Our Code* every year,
2. Certify that I have read and understand *Our Code*,
3. Comply with *Our Code*,
4. Read and sign the Associate Certification and Agreement form, and
5. Discuss with and return the signed form to my manager/supervisor.

The deadline for completing the Associate Certification and Agreement Form is **April 1** of every year.

### ASSOCIATE CERTIFICATION and AGREEMENT

By my signature below, I certify and agree that:

- I have received and read *Our Code of Conduct*.
- I understand that *Our Code* represents my responsibilities as an Associate of Trident.
- I understand that as an Associate of Trident, and as a condition of my continued employment with Trident, I am responsible to comply with *Our Code*, policies and standards.
- I understand that if my actions violate *Our Code*, policies and standards, I may be subject to disciplinary action, up to and including termination.
- I also understand that if I fail to report violations of *Our Code*, policies or standards of which I have knowledge, I may be subject to disciplinary action, up to and including termination.
- I have complied with *Our Code* and have no knowledge of any violations of *Our Code* by others.

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Associate Name (please print)

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Associate Signature

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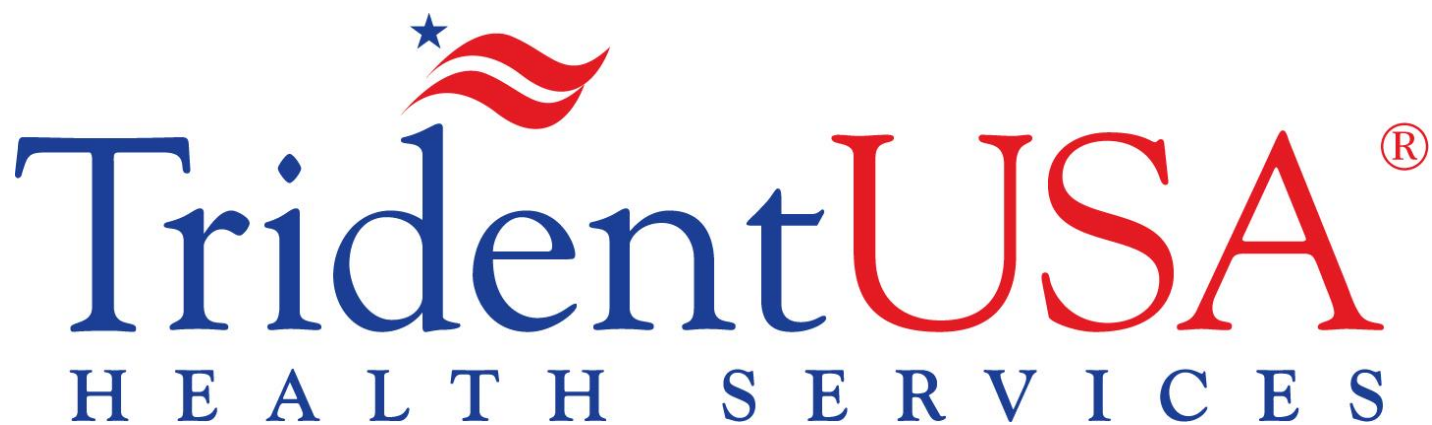
Associate Job Title

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Job Location

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Date



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