



METRO CHICAGO SURGICAL ONCOLOGY, L.L.C.

CODE OF **ETHICS** AND BUSINESS **CONDUCT**

SETTING THE STANDARD

Dear Colleague:

In healthcare, good conduct is good business. Making sure that we demonstrate the principles of ethics in all our dealings with each other, with patients, and with the community, makes Metro Chicago Surgical Oncology, L.L.C. (hereinafter referred to as "MCSO") a better place to work, a better place to receive care, and a better corporate citizen. This booklet, *Code of Ethics and Business Conduct*, has been adopted by MCSO with the full support and approval of their executive committee.

It summarizes the values and principles that guide our actions in providing outstanding patient care and it serves as a quick reference guide to help you perform your job responsibilities within ethical and legal standards.

Adhering to these values and principles will help us reach our goals of providing quality healthcare, encouraging outstanding employee performance, and preventing or correcting any improper conduct at an early stage. If you should observe potential improper conduct, it is crucial that you report it. Be assured that retaliation action against any employee reporting conduct in good faith and without the intent to maliciously harm or damage the reputation of another employee will not be tolerated.

John Hennessy
Chief Executive Officer

Paula Mateo
Compliance Officer



WE WILL ACHIEVE OUR GOALS THROUGH SEVEN PRINCIPLES:

Honesty: Be truthful in our endeavors; be forthright with one another and with our patients, communities, suppliers, payors and Board members.

Integrity: Say what we mean, deliver what we promise, and stand for what is right.

Respect: Treat one another with dignity and fairness, appreciating the diversity of our workforce and the uniqueness of each employee.

Trust: Build confidences through teamwork and open, candid communication.

Responsibility: Perform our jobs efficiently and report concerns in the workplace, including potential violations of laws, regulations and Company policies to allow for appropriate review and corrective action.

Citizenship: Obey all federal, state, and local laws and regulations and do our part to enhance the communities where we live.

Confidentiality: Maintain confidentiality both in business relationships and, in particular, all patient medical information in all care settings.

Creating an environment that supports these principles will help us achieve excellence.

While everyone at MCSO must contribute to the creation and maintenance of a good business environment, our executives and management personnel assume special responsibility for fostering a workplace that will bring out the best in all of us. The leadership of MCSO is committed to achieving these standards, and we are counting on you to do the same.

Corporate Compliance Committee

Compliance Officer; Chief Executive Officer

MCSO Executive Committee; MCSO Legal Counsel; MCSO Accounting

TABLE OF CONTENTS

Topic	Page
Introduction	3
Acting Responsibly and Reporting Concerns	5
Antitrust	6
Books and Records Accuracy	7
Bribes, Kickbacks, Improper Payments for Referrals	7
Commitment to Patients	8
Confidentiality – Protected Health Information	8
Conflict of Interest	9
Contract Bidding and Negotiation	10
Controlled Substances Management	10
Electronic Media Usage	10
Emergency Departments	11
Environmental Law	11
Human Resources Functions	12
Ineligible Persons	12
License and Certifications	12
Medicare/Medicaid Coding and Billing Standards	13
Off-Duty Conduct Guidelines	14
Patent and Invention Rights and Obligations	14
Political Contributions	14
Professional Conduct	15
Public Statements, Advertising, Publicity	15
Record Retention	15
Safeguard Records	16
Substance Abuse and Mental Acuity	16
Undue Influence	17
Use of Company Assets	17
Receipt and Acknowledgment	19
Help Set the Standard (Including Helpline Information)	20

For the purposes of this document, the term “agent” encompasses all individuals who are authorized to act on behalf of Metro Chicago Surgical Oncology, L.L.C., who are composed of but not limited to contractors, consultants, and volunteers (including other referring independent physicians).

INTRODUCTION

The Metro Chicago Surgical Oncology, L.L.C. *Code of Ethics and Business Conduct* is designed to give everyone at MCSO a clear understanding of what is expected of him or her in the workplace and as a representative of the Company. The Code applies to every MCSO employee, all managing members, members, executives, employed physicians, and contractors of MCSO, as well as to those with whom we do business.

The Code does not cover every situation. Instead, it provides broad guidelines that are detailed in MCSO policies and procedures. It is the responsibility of individuals to be aware of policies and procedures relevant to their position and to follow those policies and procedures. The MCSO Corporate Compliance Officer can provide more information upon request.

MCSO's business will be conducted with integrity and in compliance with all applicable federal, state and local laws and regulations, professional obligations, MCSO policies and procedures and in accordance with ethical standards of business conduct. No member, manager, executive, physician, employee or agent of MCSO has authority to violate any law or to direct another employee or any other person to violate any law on behalf of the organization. Anyone aware of potential problems or violations must report them immediately in order to allow appropriate MCSO inquiry and, if necessary, corrective action.

This *Corporate Compliance Plan* provides additional guidance regarding MCSO's Compliance Program and the Company's commitment to being a law-abiding, honest and ethical organization.





QUICK CHECKLIST

When in Doubt, Ask Yourself...

Are you concerned about whether this is the right thing to do? Common sense and sound judgment are your best guides in determining what to do. However, if you find yourself in a situation where you are unsure of the ethical or legal implications, ask yourself a few simple questions:

- Are my actions legal?
- Am I being honest and responsive?
- Is this in the best interests of MCSO and the patients we serve?
- Will my actions stand the test of time?
- How will I feel about myself afterwards?
- How will it look in the media?
- Will I sleep soundly tonight?

If you still need clarification, many resources are available to help you meet your responsibilities. Do not hesitate to use these resources. Ask your Manager, contact the MCSO Compliance Officer at (847) 251-6574 to answer your questions and direct you to additional resources intended to assist in fulfilling our commitment to honest and responsible corporate conduct. We are committed to ensuring that there will be no retaliation against employees raising questions or concerns in good faith and without the intent to maliciously harm or damage the reputation of another employee.

ACTING RESPONSIBLY AND REPORTING CONCERNS

Reporting Responsibility

If you have reason to believe that anyone affiliated with MCSO has violated applicable laws, rules, regulations, accreditation, standards, standards of medical practice, federal healthcare conditions of participation, MCSO policies and procedures, or the guideline set forth in this *Code of Ethics and Business Conduct*, or has otherwise acted unethically or improperly, you must report such concerns to management so that appropriate internal inquiry and corrective action can be taken. You should not conduct your own investigation.

You should use the existing organizational support structure to report potential compliance concerns whenever possible.

- The first place to start is with your manager you are uncomfortable talking to your manager or it would be inappropriate to discuss the issue with your manager, you should follow up with other support structure individuals, including the next supervisory level or any member of management.
- You may also contact the Compliance Officer by phone at (847) 251-6574, in writing to Corporate Compliance Officer, 3201 Old Glenview Road, Suite 225 Wilmette, IL 60091, or via fax at (847) 251-1690.
- **Calls to the MCSO Compliance Hotline** will be recorded and callers do not have to identify themselves; however, they may do so in order to be of assistance in giving further information about the situation. If callers choose to identify themselves, their confidentiality will be protected to the extent permitted by the law.

External Reporting of Concerns

Individuals are encouraged to share patient safety or quality of care concerns through MCSO reporting methods listed above (see Reporting Responsibility) for the company to have the opportunity to resolve the matter. Individuals should report the matter to higher levels of management until satisfied that the full importance of the matter has been recognized.

Manager Responsibilities

Managers have a special duty to communicate to their employees the importance of reporting compliance concerns. Managers should also ensure their employees understand our policy not to tolerate report concerns in good faith and without the intent to maliciously harm or damage the reputation of another employee.

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Non-Retaliation Policy and Employee Protection You will not be disciplined or otherwise treated adversely for reporting compliance concerns, questions or suggestions in good faith, and without the intent to maliciously harm or damage the reputation of another employee. If MCSO determines that someone purposely made, exaggerated, or otherwise distorted a report of wrongdoing, whether to protect themselves or to hurt someone else, that person may be subject to corrective action. Anyone who retaliates against an employee who has raised a compliance concern in good faith will be subject to corrective action.

Report Response & Confidentiality

All reported violations will be investigated. MCSO is committed to correcting issues and taking reasonable steps to ensure that it does not happen again. You must cooperate and be truthful in connection with an investigation of any suspected violation. The confidentiality of reports of compliance concerns is important and will be maintained to the extent possible. However, limited disclosure may be required in order to investigate and adequately respond to the concern. Anonymous reports are acceptable, although you should understand that, by remaining anonymous, it might be extremely difficult to ensure that your concerns are addressed.

Consequences & Corrective Action

Each member, physician, executive, employee, or agent is responsible for ensuring that his or her own conduct and the conduct if anyone reporting to him or her fully complies with this Code and MCSO's policies. Violations will result in taking appropriate corrective action up to and including termination and may include, as applicable, restitution. Conduct representing a violation of this Code may, in some instances, also subject an individual to civil or criminal charges or penalties. Individuals may also be disciplined if they do not report a compliance violation.

ANTITRUST

MCSO's physicians, employees, and agents may not exchange information with competitors regarding pricing without consulting with the Corporate Office. You may not enter into any formal or informal agreements with competitors to fix prices; allocate products, services, patients, or territories; or boycott certain suppliers, payors, physicians, or other providers. In general, avoid discussing sensitive topics such as pricing, MCSO services in the market, key costs such as labor costs and marketing plans with competitors or suppliers.

It is not unusual to obtain public information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information. However, employees should avoid seeking or receiving information about a competitor through other nonpublic means if they know or have reason to believe the information is proprietary or confidential.

BOOKS AND RECORDS ACCURACY

MCSO is required to develop and maintain accounting systems that enable and support the preparation of accurate financial statements in accordance with applicable laws, rules and accounting principles. Internal accounting controls and record-keeping policies have been established in order for MCSO to meet both legal and business requirements. Books and records must be maintained in a complete and timely manner. All assets and liabilities of MCSO must be recorded in the regular books of account. Failure to record or disclose funds or assets is not permitted. MCSO's costs must be allocated and billed correctly in order for MCSO to comply with all government payor contracts, programs or other entities properly and in accordance with their individual regulations.

You are required to maintain and comply with those controls to ensure the accuracy and integrity of our organization's documents and records. You will not make or cause to be made any entry in the books or records of the Company that intentionally falsifies the true nature of the transaction underlying the entry.

Timely and accurate completion of time-keeping records by all employees is essential. All employees will report only the true and actual number of hours worked. Expenses, properly incurred in performing MCSO business must be documented promptly with accuracy and completeness on expense reports.

MCSO's internal and external accounting staff, as part of its regular accounting procedures, will audit the books and records of MCSO to determine compliance with MCSO's policies. Any violations will be reported to the Chief Executive Officer and MCSO's compliance officer. Independent outside accountants will review and report on MCSO's financial statements and comment, as appropriate, on internal controls and will be asked to state where any apparent violations have come to their attention. Complete and accurate information is to be given in response to inquiries from MCSO's internal and independent outside accountants.

If you have concerns regarding questionable accounting or accounting matters, you should report such matters to the Chief Executive Officer at (847) 251-6570 or call the MCSO Compliance Hotline at (847) 251-6574.

BRIBES, KICKBACKS, IMPROPER PAYMENTS FOR REFERRALS

No physician, member, employee or agent may accept, ask for or offer any payment for the referral of individuals for a service covered by Medicare, Medicaid or another health benefit program. It is also a violation to accept or ask for payment for the purchasing or leasing of any good, item or service covered under such programs. In addition, physicians are prohibited from referring Medicare or Medicaid patients to a designated health service provider in which the physician or an immediate family member of such physician has a financial interest, unless permitted under the law.

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You are prohibited from receiving or soliciting payments or other benefits directly or indirectly. You may not make or offer bribes, kickbacks or illegal payments of cash or other gifts in any form and in any amount. You may, however, in the course of information or business meetings pay for/ or accept customary courtesies or amenities such as meals, provided the expenses are at a reasonable level and are not prohibited by law, policy or accepted ethical practice. You have a duty to report any actual or attempted bribery, kickback or fraud to the MCSO Compliance Officer.

COMMITMENT TO PATIENTS

Recognize each as an individual with unique healthcare needs and focus healthcare on the patient's individual needs and personal dignity. Clinical decisions (including tests, treatments, and other interventions) are based on identified patient healthcare needs.

CONFIDENTIALITY – PROTECTED HEALTH INFORMATION

To provide quality care, information is collected regarding a patient's medical condition, history, medications and family illnesses. MCSO realizes the sensitive nature of this information and is committed to maintaining its confidentiality.

Confidentiality and privacy mean not sharing patient information without the consent and knowledge of the patient as required by law. This includes information that is written, stored electronically or spoken in conversation. The laws under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and applicable state privacy laws reinforce MCSO's commitment to the appropriate confidentiality of patient information.

Information regarding a patient's personal affairs, condition, care, treatment or medical record is confidential and may be accessed or discussed only with those responsible for treatment, payment and healthcare operations. Access or discussion of patient information that is not required in the normal course of an individual's job duties/patient care responsibilities is expressly forbidden. This rule is especially relevant to casual conversations and to conversations away from patient care units or areas.

Responsible information-handling practices that safeguard patients' protected health information must be utilized. Unauthorized viewing or copying of a patient's medical record will result in corrective action. If you think you have witnessed a breach of privacy or know of another suspected problem, contact the MCSO Compliance Officer at (847) 251-6574.



CONFLICT OF INTEREST

Managing members, members, physicians, executives, employees and agents need to be sensitive to situations that could raise questions of potential or apparent conflicts between personal interests and the best interest of MCSO. As part of MCSO, each of us should consider ourselves as persons in a position of trust, and each of us should conduct ourselves accordingly. We must be particularly aware of situations where there exists or might appear to exist a conflict between the private interests of a person and the official responsibilities of a person. You may not use your position with MCSO to create personal advantage or improper personal benefits for yourself or a family member.

You are expected to devote your appropriate time and attention to your position at MCSO. Outside activities should not interfere with this commitment, should not create a conflict of interest and should not impair your ability to meet MCSO work responsibilities.

You should avoid a position or financial interest in any outside organization when such a relationship would improperly influence your professional objectivity or the performance of your duties for MCSO.

No managing member, member, physician, executive, employee or agent will ask for, take, offer or give any material payments, fees, loans, services or gifts from or to any person or firm as a condition or result of doing business with MCSO. You or your family members must not accept, directly or indirectly, gifts or entertainment that is greater than nominal value from persons, firms or corporations with whom MCSO does business. You should never accept a gift that is intended to influence, or appears to influence, a business decision. Examples of prohibited gifts include personal use of a vendor's lodging facilities or abnormally frequent and/or lavish dinners and other forms of entertainment. Questionable gifts must be reported to your manager and/or Compliance Officer.

Should a potential conflict of interest arise, you will immediately disclose the situation to the Compliance Officer at (847) 251-6574.

CONTRACT BIDDING AND NEGOTIATION

Managing members, members, physicians, executives, employees, and agents need to deal fairly with MCSO's suppliers. You should not intentionally take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair dealing practice.

CONTROLLED SUBSTANCES MANAGEMENT

Some physicians, employees, or agents routinely have access to prescription drugs and other controlled substances. Many of these substances are governed by specific regulatory organizations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorized individuals to minimize risks to MCSO and to patients. If you become aware of potential problems involving the security of drugs or controlled substances or the diversion of drugs from the organization, you must report the incident immediately to the Compliance Officer at (847) 251-6574.

ELECTRONIC MEDIA USAGE

MCSO provides communications systems, hardware, software, intranet, Internet access, email, telephone, and voicemail for employees to use for business purposes. All such systems and the communications made using them are the property of MCSO. Limited reasonable personal use of MCSO communication systems is permitted; however, users should assume these communications are not private. Users of computer and telephonic systems should presume no expectation of privacy in anything they create, store, send or receive on the computer and telephonic systems. MCSO reserves the right to monitor and/or access communications usage and content consistent with MCSO's policies and procedures. Employees are prohibited from using the systems for purposes that are illegal or otherwise contrary to the *Code of Ethics and Business Conduct*, the Confidentiality Agreement and another MCSO's policies. The security of our network and equipment is the responsibility of each or beliefs might be construed as representing MCSO. This applies to views presented on the Internet (including social media sites, blogs, forums and message boards). For additional details and guidance on appropriate online conduct, review the Social Media section of the Electronic Communication and Social Media Policy.

MCSO's security of its facilities, physicians' offices, computers, and its employees, is very important to the success of MCSO. Therefore, security measures such as IDs, passwords, remote access codes and building access cards must be protected and used as intended. You must secure portable devices such as laptop computers, cell phones, portable digital assistants (PDAs), removable media (CDs, USB drives), data, software and files, and log off Company systems and networks or use a password-protected screen saver whenever you leave your computer terminal. You may not install or use software and other items not authorized and approved by MCSO on Company systems.

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You must comply with all intellectual property rights (patent, copyright, and trademark) in connection with software and systems, and are not permitted to use unlicensed software or create or use unauthorized copies of software. Company- provided communication systems should never be used to harass or threaten anyone, to send obscene or insulting messages, or in violation of any laws. You should not portray MCSO in a negative light. Only designated individuals are officially authorized to speak on behalf of MCSO. Everyone else should avoid situations where their opinions Individuals who abuse our communications systems or use them excessively for non-business-related purposes may lose these privileges and be subject to corrective action.

EMERGENCY MEDICAL TREATMENT

The Emergency Medical Treatment and Active Labor Act (EMTALA) places certain obligations on medical service providers. MCSO may be enlisted to offer emergency services to the community when called upon by State or Federal agencies. Pursuant to EMTALA, MCSO will conduct, amongst other provisions, medical screening and, in the event an emergency medical situation exists, the stabilization of a patient or transfer as appropriate. Patients will only be transferred from a MCSO facility in accordance with strict compliance with state and federal EMTALA regulatory and statutory requirements.

ENVIRONMENTAL LAW

MCSO is committed to providing safe and healthful working conditions. It is an integral part of our management philosophy and corporate culture. MCSO promotes a safety program that includes actions that will minimize or eliminate exposure to hazardous materials (i.e., chemicals, substances).

You must comply with federal and state laws designed to protect the environment. Each employee is responsible for contributing to and maintaining a safe and healthful workplace by following safety and health rules, policies and procedures, and reporting accidents, injuries and unsafe equipment, practices and conditions.



HUMAN RESOURCES FUNCTIONS

Equal Opportunity

MCSO uses its best efforts to treat all employees and job applicants fairly while promoting diversity in the workforce. MCSO uses an individual's qualifications, skills and achievements as the basis for employment decisions, such as hiring, promotions, transfers and compensation. MCSO provides equal employment opportunities regardless of race, color, age, marital status, sex, national origin or ancestry, religion, physical or mental disability, sexual orientation, status as a disabled veteran, a recently separated veteran, an armed forces service medal veteran or other protected veteran, or other protected status as defined by law.

Sexual and Other Workplace Harassment

MCSO cannot tolerate harassment in the workplace. This includes verbal, nonverbal or physical conduct that may interfere with another employee's ability to effectively perform his or her duties or that creates an intimidating, offensive, abusive or hostile work environment. This type of conduct is contrary to MCSO's policy and may also violate the law. Unwelcome sexual advances, including requests for sexual favors, are absolutely prohibited and can result in termination of employment. MCSO cannot tolerate actions or expressions that are sexually suggestive and that create a hostile work environment. Examples of these types of actions are lewd jokes or comments, remarks that are of a disparaging nature and unwelcome physical contact. If you feel that you have experienced or witnessed harassment, you must notify Human Resources or your Manager. MCSO forbids retaliation against anyone for reporting harassment, assisting in making a harassment complaint or cooperating in a harassment investigation.

Workplace Violence

Violence, threats, intimidation and other similar behavior in the workplace will not be tolerated. Threats or assaults should be immediately reported to your Manager and/ or Human Resources.

INELIGIBLE PERSONS

MCSO does not contract with, employ or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs; is suspended or debarred from federal government contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services and has not been reinstated after a period of exclusion, suspension, debarment or ineligibility.

Physicians, employees, agents, contractors and vendors are required to report to the Compliance Officer, if they become excluded, debarred, or ineligible to participate in federal healthcare programs or have been convicted of a criminal offense related to the provision of healthcare items or services.

LICENSE AND CERTIFICATIONS

Individuals in positions that require professional licenses, certifications or other credentials are responsible for maintaining the current status of their credentials and must comply at all times with federal and state requirements applicable to their respective disciplines

MCSO does not allow relevant individuals to work without valid, current licenses or credentials.

MEDICARE/MEDICAID CODING AND BILLING STANDARDS

Patient care must be clinically necessary, appropriate and properly documented. In addition, MCSO will completely and accurately record all services provided, documenting physician authorization when necessary.

MCSO will generate billing and claims that fairly and accurately reflect services rendered, are supported by relevant documentation, and are submitted in compliance with applicable laws, rules, regulations and program requirements. You will not intentionally make or present improper, false, fictitious or fraudulent claims to any government or private healthcare program, patient, employee, department or agency.

Contracted vendors engaged to perform billing/coding services must have the appropriate skills, quality-control mechanisms, systems and procedures to ensure that billings are accurate and complete.

Improper or fraudulent activity can include knowingly undertaking any of the following:

- Cost report falsification
- Misrepresentation of services (e.g., changing medical record documentation to support medical necessity post-billing, billing for services that are not normally covered (preventive medicine visit) as if they are covered (office visit))
- Duplicate billing
- Multiple coverage and secondary-payor fraud
- False claims and statements
- Non-approved treatment or equipment usage
- Improper coding (i.e., up-coding, unbundling)
- Non-ordered/non performed testing submission
- Improper physician and other referrals
- Improper discounting
- Performing and billing for services that are not medically necessary
- Failure to return overpayments in a timely manner

Improper coding of services and care provided will not be tolerated and will result in corrective action in accordance with our policies. If you become aware of the submission of improper, false, fictitious or otherwise problematic claims, it is your obligation to report this immediately to your supervisor or call the Compliance Officer at (847) 251-6574.

MCSO will inform the appropriate governmental agency and make timely restitution when an investigation of a reported violation identifies an overpayment amount. Action steps will also include implementation of appropriate changes to prevent similar violations from occurring.

OFF-DUTY CONDUCT GUIDELINES

As a general rule, MCSO recognizes that what you do on your own time is your own business. However, certain conduct can be extremely adverse to MCSO's reputation for honesty and integrity, and/or to the trust that must exist among the organization; its directors, officers, employees, physicians and agents; and its customers.

Serious misconduct may constitute grounds for termination of employment, even though the conduct occurs during off-duty hours. Such misconduct includes crimes involving assault or battery against another person when a firearm or another dangerous weapon is used; crimes involving sexually aggressive conduct toward another person, such as sexual assault and sexual molestation of a child; acts involving the dishonest taking of property, such as theft, embezzlement, fraud and robbery; and the possession of illegal drugs or the sale of illegal drugs.

Cases in which you are convicted of criminal conduct will be reviewed by MCSO on a case-by-case basis to determine applicability. If you are convicted of criminal conduct, you must promptly notify your immediate supervisor and Human Resources within five days of the conviction.

PATENT AND INVENTION RIGHTS AND OBLIGATIONS

Any discovery or invention created by employees and applicable professional staff members (not physician members) during the scope of their employment/appointment with MCSO will be considered the property of MCSO, including any patent right in the invention. The Patent and Invention Policy provides additional details and guidance. Upon hire, by signing the Receipt and Acknowledgment document at the end of this Code of Ethics and Business Conduct booklet, employees and applicable professional staff members specifically agree to be bound by these provisions. Additionally, annual required education includes a Code of Ethics and Business Conduct electronic acknowledgment. As such, these acknowledgments serve as an assignment by the named employee or applicable professional staff member to MCSO of all rights, title and interest in all discoveries and inventions created by the employee or applicable professional staff member within the scope of his or her employment. MCSO shall act as the employee's attorney-in-fact in order to execute documents on his or her behalf for the foregoing purposes of protecting any patentable right or invention. Employees will assist MCSO in obtaining and enforcing discovery and patent rights in the discoveries and inventions while employed/appointed by MCSO and after termination of employment/appointment.

POLITICAL CONTRIBUTIONS

No political contributions may be made, directly or indirectly, with MCSO funds, assets or company resources to support any political cause, party, committee, organization or candidate for public office without the direct written authorization of the MCSO executive committee. Indirect contributions include the purchase of tickets to political fund-raising events. Political views we express as individuals are our own and not those of MCSO.

PROFESSIONAL CONDUCT

You are responsible for modeling appropriate professional behavior. MCSO will not tolerate behavior or behaviors that undermine a culture of safety. Problematic behavior includes, among others, “verbal outbursts and physical threats, as well as passive activities such as refusing to perform assigned tasks or quietly exhibiting uncooperative attitudes during routine activities, reluctance or refusal to answer questions, return phone calls or pages; condescending language or voice intonation; and impatience with questions.”

Leadership will monitor individuals for behavior or behaviors that undermine a culture of safety policy included in the MCSO Code of Conduct and Business Ethics and will consistently and equitably enforce the policy among all physicians, members and employees, regardless of seniority or clinical discipline.

Behavior or behaviors that undermine a culture of safety will be investigated and managed as required.

PUBLIC STATEMENTS, ADVERTISING, PUBLICITY

You should release information to the media, public, courts, etc. only through appropriate channels. You should use marketing and advertising activities to educate the public, provide information to the communities we serve, increase awareness of our services and recruit colleagues. You should present all communication regarding our services, including marketing and advertising, in a truthful and informative manner that provides a fair representation of services and care provided.

All media inquiries or requests should be referred to the Public Relations Department.

RECORD RETENTION

MCSO is subject to laws that require that certain records be retained for differing periods of time. It is the physician’s, employee’s or agent’s duty to comply with all policies regarding record retention, as well as all applicable laws. If you are unsure about such policies and laws, you should contact the MCSO Compliance Officer.

Medical and business documents and records include paper documents such as letters and memos, computer-based information such as email or computer files on disk or tape, and any other medium that contains information about the organization or its business activities.

Records should always be retained or destroyed according to MCSO record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, consult the Compliance Officer. For example, records must never be destroyed in an effort to deny governmental authorities that which may be relevant to a government investigation.

SAFEGUARD RECORDS

You must exercise due care and due diligence in maintaining the confidentiality, availability and integrity of information assets the organization owns or of which is custodian. Because so much of our clinical and business information is generated and contained within our computer systems, it is essential that each MCSO member, physician, employee or agent protect our computer systems and the information contained in them by not sharing passwords and by reviewing and adhering to our information security policies and guidance.

The obligation to protect MCSO assets includes confidential information such as proprietary and sensitive information.

Confidential information includes, among other things: business strategies; information pertaining to acquisitions, divestitures, affiliations and mergers; intellectual property; business marketing and service plans; designs; databases; personnel information; medical records; patient financial information including Social Security numbers and credit card data; salary data; pricing and cost records; and remove any unpublished financial data and reports. Generally, any information of the Company's that would be used by outside persons to their advantage and/or to the Company's detriment should be considered confidential. Care must be taken to refrain from discussing confidential information in public places or on non-secured communications such as cell phones. Unauthorized use or distribution of confidential information violates MCSO Policy. It could also be illegal and result in civil or criminal penalties.

If an individual's employment or contractual relationship with MCSO ends, the individual is still bound to maintain the confidentiality of information viewed, received or used during the employment or contractual business relationship with MCSO.

SUBSTANCE ABUSE AND MENTAL ACUITY

MCSO is committed to maintaining a drug-free and alcohol-free workplace. You will not use, sell, purchase, dispense or possess illegal drugs while on MCSO work time or property. You will not consume alcoholic beverages while on MCSO premises unless deemed appropriate to a particular function/event. You will not report for work in a condition that suggests the influence of illegal drugs or alcohol, or would otherwise impair your ability to carry out your responsibilities in the workplace.

MCSO may use drug and alcohol testing as a means of enforcing this policy. Violations may result in immediate termination. There may be occasions where an employee is directed by a physician to take a prescription drug that could adversely affect or impair performance on the job. As appropriate in these circumstances, the employee will report the circumstances of the situation to his or her immediate supervisor, including submission of acceptable medical documentation. Any suspected violation must be reported to management.



UNDUE INFLUENCE

It is MCSO's policy to solicit and to actually buy on the basis of relative value, recognizing that the value represents the combination of service and price which ensures the greatest ultimate economy to the user.

Should there be an instance where the supplier brings pressure to purchase on an employee by implying that it is the desire of a Member, Executive, or management employee of MCSO to do so, the buyer so coerced will immediately notify his or her manager who will notify the named manager or officer, or in the case of a Member, will notify the Chief Executive Officer, so that corrective action with the supplier can be taken.

USE OF COMPANY ASSETS

You have a duty to protect the Company's assets — including time, materials, supplies, equipment and information — and ensure their efficient use. MCSO will not tolerate theft, misuse and waste. Responsibilities include actions ranging from locking doors and cabinets to reporting observed patterns of unusual behavior.

Misuse of assets takes on many forms and can involve some deception or misrepresentation of facts and information for personal gain, as well as deliberate misappropriation of property or funds for personal use. Examples include: falsification of time worked; falsification of expenses claimed for reimbursement; theft of cash or property; personal use of MCSO's facilities, vehicles, equipment, or supplies; and conducting personal activities during work hours. Other examples include the misrepresentation of MCSO's name, inappropriate use of the Company's procurement system, or discounts to the advantage of individuals or non-MCSO entities.

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A major factor in safeguarding assets is a departmental organization that establishes clear lines of authority and responsibility, and segregates, where practical, the operation and reporting functions of the department. Managers are responsible for safeguarding M C S O assets by providing the necessary supervision, control and inventory of company property and should:

- Ensure that monthly reports of account activity are reviewed to determine that all transactions are accurate and complete, and that adequate supporting documentation exists to substantiate all transactions;
- Verify that all entries made to each account are appropriate, comply with Company policy and are allowable; and
- Take corrective action to resolve inappropriate transactions posted to the account.

You may not use MCSO's assets or your position at the MCSO for personal gain or for any other improper purpose. All MCSO assets must be used strictly for legitimate MCSO business purposes, though incidental personal use may be permitted. Any use of the organization's resources for personal financial gain is prohibited.

You must manage subcontractor and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. Our selection of subcontractors, suppliers and vendors will be made on the basis of objective criteria, including quality, technical excellence, price, delivery, adherence to schedules, service and maintenance of adequate sources of supply. Our purchasing decisions will be made on the supplier's ability to meet our needs, and not on personal relationships and friendships.

MCSO employs the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities.

Company assets must not be sold, loaned, disposed of, or used for personal purposes, regardless of condition or value, except with proper authorization.

You may not, for personal gain, take opportunities that rightfully belong to the Company (e.g., new business opportunities).

Any suspected incident of fraud or theft should be immediately reported for investigation.

MCSO requires members, physicians, employees, and agents to sign an acknowledgment confirming that they have received the Code, understand it represents mandatory policies of MCSO, and agree to abide by it.

The Compliance Program, outlined in the Corporate Compliance Plan, and this Code of Ethics and Business Conduct may be modified to reflect future changes in laws and regulations or to improve compliance at MCSO. MCSO encourages your submission of suggestions to the MCSO Compliance Officer to make the Compliance Program better.

If you have any questions about the Code of Ethics and Business Conduct or need additional information, contact the MCSO Compliance Officer at (847) 251-6574.

RECEIPT AND ACKNOWLEDGMENT

I acknowledge that I have received and read the Metro Chicago Surgical Oncology, L.L.C. Code of Ethics and Business Conduct.

I understand the ethical behaviors that are expected of me. I must adhere to these principles and standards or face disciplinary measures up to and including termination.

If I have a question concerning a compliance matter arising from the daily performance of my position, I am expected to seek assistance from an appropriate member of management or by contacting the MCSO Compliance Officer.

I am aware of my responsibility to report any concerns I may have about violations to the Code of Ethics and Business Conduct or laws or regulations to my Manager, the MCSO Compliance Officer at (847) 251-6574. Furthermore, I will fully cooperate in any investigation of conduct that may be a violation of the Metro Chicago Surgical Oncology, L.L.C. Code of Ethics and Business Conduct.

I understand that MCSO reserves the right to modify or update the Code of Ethics and Business Conduct, but also understand that I will be informed of any such amendments or modifications.

Signature

Printed Name

Manager

Specialty: (Urology) (Gynecology) (Surgery) (Lab) (Radiation) (Corporate)

Location

Date

HELP SET THE STANDARD

This booklet, *Code of Ethics and Business Conduct*, has been adopted by MCSO. It summarizes the values and principles that guide our actions in providing outstanding patient care and it serves as a quick reference guide to help you perform your duties and responsibilities within ethical and legal standards.

HELPLINE INFORMATION

For your convenience, here is an easy reference on how to report a compliance concern:

- Discuss the concern with your Manager
- Call our 24-hour, confidential Compliance Hotline:
- Write or Fax the Corporate Compliance Hotline:

(847) 251-6574

3201 Old Glenview Road, Suite 225
Wilmette, Illinois 60091

Fax: **(847) 251-1690**

OUR COMMITMENT

We are committed to ensuring that there will be no retaliation against employees raising questions or concerns in good faith and without the intent to maliciously harm or damage the reputation of another employee.