



Code of Conduct

April 1, 2024

What is the Code of Conduct?

This Code of Conduct (“Code”) is an important component of AMSURG’s Corporate Compliance and Ethics (“CCE”) Program. It applies to all of AMSURG, including its subsidiaries and managed entities and affiliated surgery centers (collectively “AMSURG”) and all members of AMSURG’s workforce, including owners, officers, directors, employees, contractors, clinical and medical staff, consultants and vendors (“AMSURG Partners”).

Purpose.

Our aim is not only to provide best in class healthcare but to do so with integrity, compassion and respect for each other and our patients. The Code is an important expression of our commitment to caring for patients and supporting the work of our surgical centers (“Centers”) in the right way. Our objective is for all AMSURG Partners to act with the utmost integrity and do the right thing, even when nobody is watching.

AMSURG is committed to:

- achieving high standards of business and personal ethical conduct
- complying with all local, state and federal laws and regulations
- providing quality and compassionate healthcare services

We intend to carry out this commitment by creating and maintaining a positive working environment built on our strong values of honesty, respect and integrity.

Expectations.

Compliance with this Code is mandatory. Compliance and integrity is a shared activity by everyone, regardless of position, skill or work location. Everyone — all AmSurg Partners, including temporary, part-time and full-time – must support the Company’s efforts to comply with laws and maintain ethical standards.

You are responsible for knowing and abiding by this Code, our CCE and all policies and laws applicable to your assigned duties and responsibilities. AMSURG Partners are responsible for ensuring that their attitude, behavior and activity are consistent with this Code. Whatever your role is, your behavior communicates our standards to others and your expectations for them to observe the same high standards.

Any violation of the Code may result in corrective action, up to and including termination. AMSURG Partners who are aware of Code violations and fail to report the violations to the Company may also be subject to corrective action.

This Code of Conduct is not intended to cover every situation that an AMSURG Partner may encounter. In addition to the Code, we have more detailed policies and procedures that address specific situations. All AMSURG Partners should also consult these policies and procedures.

Foster a culture of compliance.

AMSURG's leaders have a responsibility to ensure commitment to compliance with our policies, this Code, and applicable laws. We expect all leaders, including directors, executives, board members, managers, supervisors, Center leaders and team leaders to effectuate these standards daily, including by setting a personal example of respect and integrity for all patients and AMSURG Partners, creating a culture of compliance, and maintaining open lines of communications so their team members can raise concerns without fear of retaliation. AMSURG's leaders are expected to act on concerns raised by their team or any other AMSURG Partner in a timely and appropriate manner.

Duty to act.

If you become aware of a violation of this Code, our policies, or any law, you have a duty to report that violation. If you become aware of any situation that is inconsistent with the expected behavior as outlined in this Code, you have a duty to report the situation. The first person you may want to talk with is your supervisor. If, however, you are uncomfortable going to your supervisor, you should contact a Center leader or the Compliance Department by e-mailing amsurgcompliance@amsurg.com where you can report the violation or request that the Compliance Department call you to discuss the matter. You can also submit a report anonymously at any time (24 hours a day, 7 days a week) to the Compliance Hotline (1-844-859-1120). Confidentiality will be maintained to the extent it is possible to do so.

Failure to act when you are aware of a situation that is inconsistent with the expected behavior can result in disciplinary action.

AMSURG prohibits any retaliation against someone who raises good faith concerns about a situation. Any "get even" behavior will not be tolerated. If retaliation occurs, it can result in discipline, up to and including termination.

Diligently investigate compliance matters.

We are committed to making sure that compliance issues receive sufficient and appropriate attention. Every call, question, or concern will be taken seriously. It is AMSURG's policy to diligently review, investigate and address reported concerns so that we can ensure that our conduct is compliant with relevant laws and so that we can promptly correct any problem.

All AMSURG Partners are expected to cooperate honestly, truthfully and fully with any review or audit being conducted by our internal compliance and audit teams.

Again, AMSURG prohibits retaliation against anyone who raises a good faith legal or ethical issue or participates in a compliance investigation. "Getting even" behavior will never be tolerated.

Updates.

This Code will be updated as necessary, and AMSURG will distribute any change or update by posting the updated version on the AMSURG intranet. While AMSURG will generally attempt to communicate changes concurrent with/or prior to the implementation of such changes, Company reserves the right to modify, amend or alter the Code of Conduct without notice to any person or employee.

Relating to Those We Serve – Patients, Family Members, and Caregivers

Treating patients with dignity and respect.

Patients are our first priority. We are committed to providing quality and safe patient care and it is the obligation of every AMSURG Partner to uphold this commitment. We treat all patients with compassion, dignity, and respect. We do not discriminate on the basis of age, gender, disability, race, color, ancestry, citizenship, religion, sexual orientation, gender identity or expression, national origin, marital status or any other basis prohibited by federal, state, or local law.

We only perform services that are either medically necessary or cosmetic in nature. We recognize that our patients have a right to be involved in decisions affecting their care. We include family members and caregivers as is appropriate and seek to understand their needs and the patient's needs as it affects care. We respond promptly and courteously to patient inquiries and requests, respect advance directives, and disclose medical errors and adverse events according to the appropriate process. In any circumstance where an AMSURG Partner has a question about whether these quality or patient safety standards are being met, the AMSURG Partner is obligated to raise this concern to a supervisor, medical director or Compliance Department.

Maintain patient privacy.

We respect the confidential nature of our patients' personal information. We expect all AMSURG Partners to comply with all confidentiality and privacy policies, procedures and federal and state privacy laws, such as the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Generally, unless otherwise permitted or required by law, we must not use or disclose patient health information without the patient's authorization. The laws concerning the privacy and security of health information are very broad and cover many of our business activities. We have adopted a number of policies and procedures directly related to these issues and have also developed a separate training program to address the specific privacy and security requirements adopted as part of HIPAA.

Access to any medical record should be done only if permitted by your job responsibilities. Accessing medical records that are not necessary for your job or out of curiosity is not permitted and could lead to disciplinary action.

Patient issues should not be discussed in public areas or with non-authorized personnel. Do not speak to a patient in front of family or friends regarding their past medical history, diagnoses or conditions, or medications without the patient granting permission, unless the patient is unable to provide such information due to his/her medical condition. In addition, patient information should never be left in unattended areas. Always consider how you would like others to handle your personal information.

Social media sites should be used responsibly. Posting patient information or proprietary information is prohibited. When posting comments to social media websites consistent with our policies, AMSURG Partners should be respectful, honest and accurate and should never include patient information or proprietary information. Teammates should not post information that is related to confidential business transactions or that may run afoul of any privacy laws, including HIPAA.

Relating to Our Partner Physicians and Referral Sources

Do not pay for referrals or offer kickbacks.

Federal and state laws and regulations, including the federal Anti-kickback law, govern the relationship between Centers and physicians (or other practitioners) who may refer patients to the Centers. It is important for AMSURG Partners who interact with referral sources, particularly those involved in setting up arrangements that involve making payments to physicians for services, providing space or services to physicians, recruiting physicians or other practitioners, be aware of the laws, regulations and policies that apply to these relationships.

In compliance with these laws:

- *We do not pay for referrals.* We will not make or offer any payment, incentive or anything of value to *anyone* to induce or reward the referral of patients or patronage to a Center.
- *We do not accept payments for referrals we make.* We do not accept any payment, incentive or anything else of value from anyone in exchange for the referral of patients.
- *We do not condition referrals upon use of our Centers.* Our practitioners, including physician owners in our Centers, will not condition referrals to another practitioner or otherwise require another physician to perform cases referred by the physician at a Center.

Financial relationships with referral sources.

All financial relationships between AMSURG and any referral source, including physician owners in our Centers, shall be properly structured in compliance with applicable federal and state fraud and abuse laws. We will not, and legally cannot, compensate any referral source based on actual or potential volume or value of patient referrals to a Center. All financial arrangements with referral sources should be for a legitimate business purpose, be in writing and include fair market value compensation.

Center ownership may only be sold to a qualifying physician at fair market value. The sale of more or less of ownership interest depending on the referrals generated by such person is strictly prohibited. We will not:

- offer ownership in a Center in exchange for referrals
- admit a physician as an owner of a Center or allow a physician to become or remain an owner of a Center based on his or her ability to generate referrals for other physicians
- withhold any compensation from any owners who do not refer patients to a Center

All earning distributions of a Center shall be made pro-rata based on the percentage of ownership held by each owners and shall in no way be based on the volume or value of referrals to a Center.

Additionally, all physicians who own an interest in one of our Centers are required to notify patients of their financial interest in the Center(s) before or at the time of making a referral.

Avoid the improper giving or receiving of gifts, business courtesies or entertainment.

Although we recognize that gifts and tokens of appreciation often come from a place of giving and gratitude, because of the highly regulated industry in which we operate, it is very important that any gifts, business courtesies (i.e., free services) or entertainment be offered only in accordance with our policies. All gifts, business courtesies and entertainment given or received must be small or modest in value to avoid inappropriately influencing independent judgement and referral decisions. We will never

- give or receive bribes or kickbacks
- give or receive gifts, business courtesies or entertainment for the purpose of inducing or rewarding referrals
- give or receive gifts, business courtesies or entertainment that runs afoul of a policy or law

There are specific laws governing gifts, business courtesies and entertainment given to or received from Centers and their employees, physicians or other referral sources, governmental officials, and Medicare, Medicaid or TRICARE patients. Consult our applicable policies or check with a supervisor for guidance before giving or receiving such gifts.

Relating to One Another

Maintain a collaborative and respectful work environment.

We regard our co-workers as trusted and dedicated allies. We are committed to an inclusive workplace where everyone is treated with fairness, dignity and respect. AMSURG provides equal employment opportunities to qualified people without regard to race, color, creed, ancestry, religion, sex, age, national origin, disability, sexual orientation, gender identity or expression, genetic information or veteran status. We strive to create a workplace in which we celebrate cultural and other differences.

We are committed to an alcohol and drug free workplace. AMSURG does not tolerate

- The use, sale, possession, transfer, manufacture, distribution, dispensation and purchase of non-medically prescribed controlled substances or alcohol at our property
- Reporting to work under the influence or effects of such substances

We maintain a safe, positive working environment free from harassment or violence. AMSURG does not tolerate any form of harassment, sexual or otherwise, including degrading or humiliating jokes, slurs, intimidation, sexual, or other harassing conduct. If you feel harassed or threatened, please speak up so that we may address the situation. If you witness or observe anyone being harassed or threatened, you have a duty to report it immediately.

AMSURG strives to comply with all laws, regulations and policies related to employment-related activities and expects AMSURG Partners to abide by these laws and regulations. AMSURG has a comprehensive set of policies related to employment practices and compliance with employment-related laws and regulations that address issues such as diversity, harassment, workplace violence, substance abuse and health and safety. Please consult the Employee Handbook for applicable Company policies.

Maintain a safe and clean working environment.

All AMSURG Partners must comply with all government regulations and rules, AMSURG policies and required Center practices that promote the protection of workplace health and safety. We comply with all applicable environmental laws and regulations and maintain all necessary environmental permits and approvals. AMSURG expects you to follow all health and safety standards, including the appropriate procedures for handling, storage, use, shipment and disposal of all materials that are regulated under any applicable health and safety or environmental law. AMSURG Partners should immediately advise a supervisor of any serious workplace injury or of any situation presenting a danger of injury so timely corrective action may be taken to resolve the issue.

We are committed to taking steps to conserve natural and other resources when managing and operating our businesses. We dispose of blood or chemical contaminated items properly. We recycle papers and other materials where possible; and, we will take into consideration commitments to sustainability when choosing vendors and suppliers.

Comply with all professional licensure requirements.

AMSURG expects you to maintain all required professional licenses, certifications or other accreditations and to comply with all ethical standards of your respective professional organizations. AMSURG Partners should diligently renew their licenses and certifications as needed to ensure they remain current and in good standing. AMSURG does not allow any AMSURG Partner to perform services or supervise others without valid, current licenses or credentials. Also, AMSURG expects you to perform only those professional duties that are within the scope of practice authorized by your licenses and credentials.

No excluded individuals or entities.

We will not employ, do business with, or otherwise engage any individual whom we know is excluded from participating in any federal healthcare program or suspended or debarred from procuring federal government contracts. To ensure compliance, we will check the status of all potential AMSURG Partners prior to affiliation and will routinely re-check their status after hire or engagement. All AMSURG Partners are required to report to AMSURG if they become excluded, debarred, suspended or otherwise ineligible to participate in federal healthcare programs, or if such an exclusion, debarment or suspension or ineligibility is pending or threatened.

Training is mandatory.

You can expect AMSURG to provide mandatory training for your job. AMSURG employees are required to attend training or complete training exercises, whether in-person, virtually or online, at various times each year, including compliance training.

Follow expense reimbursement guidelines.

Consistent with AMSURG policies and procedures, AmSurg Partners seeking reimbursement of expenses must comply with applicable approval and tracking requirements; and must accurately complete and submit required documents in a timely manner. All travel and entertainment expenses must be consistent with your job responsibilities and the needs and resources of AMSURG and applicable Centers. AMSURG Partners should not incur a financial loss or gain from appropriate business expense reimbursements.

Avoid conflicts of interest.

Conflicts of interest arise from time to time in any business setting and it is important that they be identified and handled appropriately to preserve the integrity of our operations. In general, business decisions must always be made in the best interests of AMSURG and not motivated by personal interest or gain. If you have a conflict of interest, you must report the conflict to AMSURG.

AMSURG Partners should not participate in any activities or enter into relationships that conflict or appear to conflict with their AMSURG responsibilities. In other words, you should avoid any interests or activities that conflict or interfere with, or appear to interfere with, your ability to perform your duties in a loyal and responsible manner or place you in conflict with the interests of AMSURG.

This includes activities, business relationships, or financial investments that could influence or appear to influence your judgment or ability to perform your duties on behalf of AMSURG objectively and effectively or if you or your family member receive improper benefits as result of your position in AMSURG.

For example, it is a conflict of interest for an AMSURG Partner or their family members to profit or personally gain as a result of his or her position with AMSURG beyond compensation and benefit programs received from AMSURG. Some other examples of possible conflicts of interest include:

- Awarding business to a family member or entity owned or controlled by a family member
- Owning an interest in an entity that is a competitor or supplier of AMSURG
- Providing AMSURG charitable contributions to entities where a friend or family member has an interest
- Receiving loans or guarantees of an obligation from a customer or vendor
- Accepting a gift that influences a decision with respect to a specific vendor or customer
- Requesting another AMSURG Partner assist with personal business or non-work activities on company time

You have a duty of loyalty to AMSURG, which must override any prior and current relationships to customers, competitors, or suppliers. When conflicts of interest cannot be avoided, transparency (i.e., disclosing the conflict promptly) becomes vital to maintaining the integrity of our business decisions. Conflicts of interest must be promptly disclosed in accordance with AMSURG policies. Waivers or exceptions to any conflict of interest must be approved in writing by the Compliance Department and/or the Legal Department.

Use AMSURG property, e-mail, voicemail, and computer systems appropriately.

AMSURG property, as a general rule, should only be used to further AMSURG's business, unless you receive prior approval for another use by your manager. When we refer to AMSURG property, we mean all the resources we use to conduct our business, such as the physical spaces and facilities, materials, supplies, equipment, telephones, copying machines, computers, software systems and services that AMSURG pays for to support its activities and all AMSURG information that we use to do our jobs.

AMSURG property should be used wisely and never needlessly wasted. We also need to take precautions to protect it from misuse or theft. In order to ensure that property is being used in compliance with our policies and the law, AMSURG retains the right to access its property at any time, without notice. This means that we may take actions such as monitoring, opening, inspecting or copying any AMSURG property, including accessing electronic communications transmitted or received through the Company's systems and/or personal phones.

All communications systems, including but not limited to computers, software, e-mail, internet access, company-provided phones, company-related communications on personal phones and voice mail are the property of AMSURG. Remember that what you write in an e-mail or text is public information, not your personal information; and, that management can review your e-mail and text messages.

Preserve confidential information.

Much of the information that AMSURG Partners have access to and use in the course of business has been developed by or for AMSURG and is extremely valuable and necessary in helping AMSURG operate successfully. This information, including our trade secrets, is confidential and proprietary and generally is not available to others. Examples of confidential or proprietary information are pricing structures, contract terms, proposals, business plans, processes, personnel information, customer or patient information, passwords and other information that either AMSURG has not released publicly or which is copyrighted and not available for use by other companies.

This information should only be distributed to AMSURG Partners and others with an absolute need to know such information, provided disclosure is not prohibited by law or regulation. We expect you to maintain the confidentiality of this proprietary information and protect it against unauthorized disclosure, theft, or loss.

Much of AMSURG's confidential information is generated and contained within our computer systems. It is essential that AMSURG Partners protect our computer systems and the information contained therein by adhering to our information security policies and by not sharing computer passwords. Your computer password is yours alone. Prior to sending confidential information outside of AMSURG, the AMSURG Partner must validate the individual or entity receiving the information. Confidential information should only be shared electronically – internally or externally – through AMSURG approved means (e.g., encrypted emails) in accordance with our security policies.

AMSURG Partners must be extremely careful in the use of Social Media, taking care not to disclose confidential information – whether at work or at home, and using AMSURG or personal systems.

By its very nature, confidential information is compromised if it is made public. Therefore, the requirement to safeguard this type of information remains an ongoing obligation, even if your employment or engagement with AMSURG ends.

Maintain accurate books, records and reports.

AMSURG's books, records and reports must be truthful and accurate and must be maintained in compliance with our policy and federal, state and local laws. The failure to maintain accurate books, records and reports may expose AMSURG and AMSURG Partners to significant civil damages, substantial criminal fines and other penalties. We expect every AMSURG Partner to take responsibility for the integrity of information that is included in business documents, whether that information is financial, operational, statistical or other business data.

We expect our accounting and financial information to reflect actual transactions and be prepared accurately and completely, on a timely basis and in conformance with generally accepted accounting principles and other applicable accounting standards and rules. If you learn of a material error or omission that may affect AMSURG's books, records or reports or have concerns regarding questionable accounting or auditing matters, you must report such matters to a supervisor, the Chief Compliance Officer, the Board of Directors' Audit Committee chairperson, or the Compliance Hotline (1-844-859-1120).

You must never intentionally enter, record or report false, misleading or inaccurate information. You must never alter or falsify information in any document, including medical records; or, destroy records in an attempt to prevent the appropriate authorities from reviewing that information. It is the responsibility of physicians and other clinical personnel

to ensure that our medical records are clear and complete and that they accurately reflect the care that was provided to a patient. You must not exaggerate or lead others to document events in an inappropriate way.

In accordance with its record retention policy, AMSURG plans to retain records only as long as they may be potentially useful for business purposes or as may be required under federal or state law or regulation. We expect that all AMSURG Partners will follow the policies for the retention and disposal of records. AMSURG Partners must not tamper with, remove or destroy records prior to the specified date in our policies without first obtaining permission.

Do not use insider information.

You may become aware of information not available to the general public that would be considered important by an investor in deciding whether to invest in AMSURG or another company. You may not discuss this type of information with anyone outside of AMSURG and you may only discuss this information within AMSURG on a strictly "need to know" basis. You are prohibited by securities laws from trading in the securities of any public company on the basis of material non-public information. If you obtain access to such information, you will not use the information to trade the stock of any public company or tip others to do so.

Relating to External Parties

Compete fairly in the marketplace.

We are committed to fair and open competition and will comply with all applicable antitrust laws. While we will compete vigorously in the marketplace, we will only do so in accordance with the highest standards of business ethics. We will not make agreements with competitors to stifle competition or engage in inappropriate tactics to eliminate competition. We also will avoid any activities that may be construed as unethical, an unfair method of competition or a deceptive or unfair practice.

We are free to choose our suppliers and to refuse to do business with any particular supplier as long as that decision is made independently and does not involve any agreement with another company or person. We generally will not enter into exclusive arrangements with suppliers, which unreasonably restrict the suppliers' ability to deal with our competitors. However, certain types of exclusive agreements with suppliers are permissible. Consult with the Compliance Office before entering into these arrangements.

Marketing and advertising.

Consistent with laws and regulations that may govern such activities, AMSURG may use marketing and advertising activities to educate the public, provide information to the community and increase awareness for our services. We strive to present only truthful, fully informative, and non-deceptive information in these materials and announcements.

Act appropriately when participating in political activities.

We respect your right to participate or not participate in the political process; however, it is important to separate personal and corporate political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials. Your political contributions must not be, or appear to be, made with or reimbursed by funds or assets from AMSURG. Similarly, you shall not use work time or AMSURG facilities for a candidate or political party.

AMSURG and its representatives comply with all federal, state, and local laws governing participation in political activities. AMSURG has specific procedures regarding all political contributions and those procedures must be strictly followed in order to comply with laws that restrict the use of AMSURG funds, property and services in connection with elections. The conduct of any political action committee is to be consistent with relevant laws and regulations. In addition, political action committees associated with AMSURG select candidates to support based on the overall ability of the candidate to render meaningful public service.

From time to time, AMSURG may identify legislative issues that affect our business. In certain instances, you may be encouraged to support or oppose such legislation. This participation is entirely voluntary.

Protect our intellectual property rights and the intellectual property rights of others.

All AMSURG Partners must protect AMSURG's patents, copyrights, trademarks, and other intellectual property. You are expected to fully support this effort. You should not enter into agreements relating to AMSURG's intellectual property without appropriate approval. We also will comply with all intellectual property laws and not infringe on the intellectual property rights of others.

Relating to Those Who Oversee Our Industry

Comply with all laws and regulations.

The healthcare industry is highly regulated. All individuals must abide by the laws and regulations impacting the healthcare industry or be subject to disciplinary action up to and including employment and/ or contract termination. Although AMSURG does not expect any single individual to understand all details of very technical and complex healthcare laws, rules and regulations, you are expected to be knowledgeable about and comply with the laws and regulations that apply to your job responsibilities and to seek guidance when questions arise.

We have developed policies and procedures to address many of these laws and regulations. We expect you to follow all policies and procedures applicable to your position, as well as all state and federal laws and regulations pertaining to our business. You have a duty to act if

- you have a question about any legal obligations, policies, or procedures
- you are aware of violations or suspected violations
- you suspect someone is not complying with any legal requirements, policies, or procedures

Interacting with government employees.

It is illegal to offer or give anything to a government official or employee in order to influence that government official or employee to use his/her government position and power to help AMSURG. Not only must we refrain from this activity, but we must also avoid the appearance of inappropriate influence. AMSURG Parties may not buy lunches, give gifts or do anything that directly or indirectly benefits government officials or employees for the purpose of influencing the government official or employee to use his or her position to help AMSURG. Any questions should be directed to the Legal Department or Compliance Department.

Accreditation and licensure surveys.

Many of our Centers undergo surveys from time to time by governmental agencies, federal healthcare programs or accreditation organizations. We expect AMSURG Partners to cooperate fully with surveyors. In preparation for, during and after surveys, AMSURG Partners must deal with all accrediting and external agency survey bodies in a direct, open and honest manner. No action should ever be taken in relationships with accrediting or external agency survey bodies that would mislead the accrediting or external agency survey teams, either directly or indirectly. AMSURG Partners must never conceal, destroy, or alter any documents; lie; or make misleading statements to the agency representative. You also must never attempt to cause another colleague to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law. Anyone aware of violations or suspected violations of truthful and factual representations and responses to survey agencies must report them immediately to a supervisor, the Center leader, or the Compliance Department.

Cooperating with government reviews and investigations.

It is AMSURG policy to cooperate with government investigations and inquiries. In the context of a government review or investigation, AMSURG Partners are expected to act with integrity and honesty. This includes:

- Not destroying documents or information in anticipation of a request for those documents from a government agency or court
- Not altering company documents or records
- Not lying or making misleading statements to government investigators during any investigation
- Not pressuring anyone to hide information or provide false or misleading information to government investigators

All AMSURG Partners are expected to cooperate with our Compliance and Legal Departments and with our attorneys and internal auditors and with all government representatives, as provided by policy.

Both AMSURG and AMSURG Partners have the right to be represented by legal counsel during any government investigation or inquiry. This means that you have the right to have a company representative or an attorney present during questioning whether that questioning occurs during business hours or away from AMSURG property. If you are contacted by a third party in connection with a government investigation, immediately contact the Legal Department or the Compliance Department.

Sometimes, the Company receives a subpoena or other legal requests for information. The Company has developed specific policies and procedures for releasing information in response to subpoenas and legal inquiries. For legal reasons, it is very important that these procedures be followed. Any requests for information under these circumstances should be immediately directed to the Legal Department at AmSurgLegal@amsurg.com.

Controlled substances.

Some AMSURG Partners routinely have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations. Prescription and controlled medications and supplies must be handled properly and only by authorized individuals to minimize risks to AMSURG, AMSURG Partners and to patients. If any AMSURG Partner becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs from AMSURG, the incident must be reported immediately. AMSURG strictly enforces reporting of any violations of diverting medications by AMSURG Partners.

Bill for services in a manner that is legally appropriate.

We expect claims for services provided to patients for reimbursement, whether submitted to government healthcare programs or commercial payers, to accurately reflect the services provided to our patients and to comply with all pertinent billing rules and regulations. To support our ability to submit accurate claims, medical records must provide complete documentation of the services rendered.

Any AMSURG Partners engaged in billing or coding services are expected to have and maintain the necessary skills, quality control processes, systems, and appropriate procedures to ensure all billings for governmental and commercial insurance programs are accurate and complete.

We will not tolerate false, fictitious, or fraudulent claims. We must not submit false, fraudulent or misleading claims to any payor.

The Civil False Claims Act (“FCA”) is a federal law that covers fraud involving any government-funded program, including the Medicare and Medicaid programs. The FCA establishes liability for any person who **knowingly** submits or causes to be submitted a false or fraudulent claim for payment to the U.S. government. The term “knowingly” is not limited to situations where there is actual knowledge of the falsity of a claim; the term also includes the submission of a claim in deliberate ignorance or in reckless disregard of the truth or falsity of the claim information. Billing twice for the same service, billing a higher level of service than what was actually provided, unbundling charges when bundling is required, and billing for services or items that were never provided are all examples of false claims. Penalties are significant: a fine, adjusted annually for inflation (e.g., \$13K-27K for 2023), per false claim filed, plus three times the amount of the government’s damages or overpayment. There is also a criminal FCA that can result in prison and additional criminal fines.

One of the unique aspects of the FCA is the “qui tam” provision, commonly referred to as the “whistleblower” provision. This allows a private person with knowledge of a false claim to bring a civil action on behalf of the United States. The purpose of bringing the qui tam suit is to recover the funds paid by the Government as a result of the false claims; and, if appropriate, entitles the whistleblower to a percentage of any recoveries. The FCA also contains a provision that protects a whistleblower from retaliation by his employer for filing a claim. In addition to the federal civil and criminal FCAs, most states also have similar false claims laws.

If you encounter any billing situation that you believe is improper (whether intentional or unintentional), you have a **duty to immediately report** your concerns to the appropriate person, a supervisor, management, or the Compliance Department.

Working outside the United States.

It is AMSURG's policy to prohibit corruption of any form, and to comply with all applicable U.S. and foreign anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act and the local laws and regulations in the countries in which we do business, directly or indirectly. These laws prohibit bribery and mandate that companies establish and maintain accurate books and records and sufficient internal controls. These laws also prohibit unlawful gratuities, which is the act of giving or promising something of value to a public official because of an official act, either before or after the act has been done. AMSURG Partners should clearly avoid even the appearance of such “*quid pro quo*” arrangements.

Specifically, AMSURG Partners are prohibited from offering, promising, making, or authorizing a bribe or payment of any item of value, either directly or indirectly, to any Public Official, including any representative of a Public Official, or to any other person, when the payment is intended (i) to obtain or retain business or any other business advantage by (ii) influencing a desired action, inducing an act in violation of a lawful duty, causing a person to refrain from acting in violation of a lawful duty, securing any improper advantage, or influencing the decision of a government or government instrumentality. In addition, AMSURG Partners must not solicit, demand, request, or accept a bribe or any other Payment from any person where the purpose of the Payment is to obtain or retain any business advantage.

Foreign Corrupt Practices Act

As global opportunities arise, and should your role involve supporting those efforts, it is important for you to understand and comply with the FCPA. The FCPA makes unlawful certain conduct by or on behalf of U.S. companies abroad. The FCPA is comprised of two basic elements: (1) anti-bribery provisions which prohibit the payment of bribes to foreign officials to obtain or keep business, and (2) accounting provisions which require public companies to maintain accurate books and records, and an adequate internal accounting system. Consult with Compliance or Legal if you have questions about the FCPA.

UK Bribery Act

As global opportunities arise in the United Kingdom (“UK”), and should your role involve supporting those efforts, it is important for you to understand and comply with the UK Bribery Act. The UK Bribery Act makes unlawful certain conduct by or on behalf of U.S. companies. The UK Bribery Act is comprised of four basic elements: (1) bribing, (2) being Bribed, (3) bribery of a foreign public official, and (4) failure by a company to prevent bribery. Consult with Compliance or Legal if you have questions about the UK Bribery Act.

In Closing

AMSURG is committed to this Code of Conduct. We expect you to abide by it. Together we will provide the care and services our patients expect and deserve.

ACKNOWLEDGMENT OF CODE OF CONDUCT AND CONFLICTS OF
INTEREST DISCLOSURE FORM

I certify that I have viewed AMSURG’s Code of Conduct. I have read the Code and I understand that it outlines my responsibilities as a temporary, part-time and/or full-time employee independent contractor, clinician, officer, or director (as applicable) of the Company.

I agree to fully comply with the standards, policies, and procedures.

I understand that I have an obligation to report any suspected violation of the standards, policies, and procedures.

I understand that the Company has provided me with access to a toll-free Compliance Helpline number to answer any questions I may have and/or allow me to report any suspected violations of this Code of Conduct.

I will report any known or perceived violations of the Code to my supervisor or the Compliance or Legal Department as soon as possible but without unreasonable delay.

I further certify that I have read and understand the Code of Conduct section entitled CONFLICTS OF INTEREST and that ...

I have no conflicts of interest.

I request assistance in determining whether I have a conflict of interest.

If you checked the last option, please describe:

Please sign this form.

Name (Print) _____

SIGNATURE: _____

DATE: _____