

AtlantiCare

Policy & Procedure	<i>ID No.</i>	403
<i>Subject:</i> Code of Business Ethics and Corporate Compliance	<i>Category:</i>	Human Resources
<i>Facility Scope:</i> AtlantiCare Health System	<i>Department:</i>	General

POLICY

The purpose of this Code is to outline the standards of professional conduct for all Board Members and employees, as AtlantiCare Health System strives to realize the vision of building healthy communities. The Code is intended to promote the disclosures, discussion and resolution of conflicts and non-compliance whether real, potential or perceived. All such disclosures are subject to waiver as set forth in this Code. This policy will also serve to provide guidance to Board Members and Employees in order to minimize the likelihood that they enter into relationships that are in conflict, or appear to be in conflict, with their responsibilities to AtlantiCare Health System, its patients and other customers (see "DEFINITIONS" for current AtlantiCare Health System affiliated entities), or are in conflict with Federal, State or Local laws or regulations governing our business conduct.

PROCEDURE

All personnel are committed to supporting the mission of AtlantiCare Health System which, as an integrated system of services, assists people to achieve optimal health. This system, driven by customer needs and expectations, provides accessible, comprehensive services of superior quality and value.

Additionally, all persons associated with AtlantiCare Health System have a responsibility to act in ways that merit trust and confidence of peers, as well as the general public. It is a basic, operating standard of AtlantiCare Health System that all of its business affairs shall be conducted legally, ethically, and with strict adherence to the highest principles of integrity and propriety. This policy contains a number of illustrations and guidelines designed to help Board Members and Employees, under certain circumstances, make decisions that comply with the "spirit", as well as the "letter" of the Code. However, this Code can only provide general guidelines.

Personnel are charged with the responsibility to exercise care to avoid or prevent conduct that might reasonably appear to be in conflict with laws or regulations or with the best interests of AtlantiCare Health System, its patients and staff. Employees who have questions as to whether an existing or potential conflict with the Code exists should consult with their direct report and/or their Senior Management Representative. Board Members who have questions should consult with AtlantiCare Health Systems corporate counsel. In other words, ***IF YOU ARE UNSURE, PLEASE ASK.***

All AtlantiCare employees are encouraged to bring their concerns regarding safety or quality issues up the chain of command by communicating to their direct report, the Human Resources Department, their senior management representative, Administration, the Department of Health, JCAHO. Individuals reporting concerns pursuant to this policy will not be subject to disciplinary or other retaliatory actions by the organization.

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For issues that relate to compliance with any laws or regulations, individuals may also call the Compliance Phone Line at (609) 407-7788 (3-7788 internally), or write to the Corporate Compliance Officer at 2500 English Creek Avenue, Bldg. 500, Egg Harbor Township, NJ 08234.

AtlantiCare Identification will mean the name(s), logo(s) or other trademark(s), whether registered or not, that is typically used as a means to identify AtlantiCare (or any of its affiliated entities).

AtlantiCare Information will mean any information obtained that relates to AtlantiCare, its patients, its affiliated entities or to Outside Organizations doing or seeking to do business with AtlantiCare.

AtlantiCare Property will mean any real or personal property owned or leased by AtlantiCare; and, any commercially valuable, proprietary software products and related systems trade secrets, including any formula, pattern, device or compilation of information, unique or specialized marketing concepts and other work products (hereinafter referred to as "**Intellectual Property**").

Board Member(s) will mean any legally elected and/or appointed member of the Board of Trustees of AtlantiCare Health System; including the Boards of all affiliated entities including advisory and emeritus Board members (see definition of AtlantiCare Health System).

Business Opportunity will mean any opportunity to enter into, participate in or engage in a transaction which would result in profit or other non-monetary benefit for AtlantiCare if the opportunity was disclosed and offered to AtlantiCare and AtlantiCare participated or engaged in the transaction.

Compliance will mean adherence to any Federal, State or Local law or regulation applicable to the operation of any of our businesses.

Conflict, Conflict of Interest is a situation, isolated, recurring, or continuous, in which Board Members' or Employees' decisions on behalf of AtlantiCare or its patients may be influenced by their own personal gain or advantage, either directly or indirectly, financial or otherwise.

Corporate Officer will mean an individual authorized by the Board of Governors/Board of Trustees of the applicable entity to hold the title of Administrator, Vice President and above.

Employee(s) will mean any full-time or part-time employee of AtlantiCare, including employed physicians. In addition to this Code, **Employed Physicians** are bound by the By-Laws, rules and regulations governing ARMC's Medical Staff, as well as the policies developed by ARMC's Institutional Medical Ethics Committee.

Financial Interest. A person has a Financial Interest if the person has, directly or indirectly, through business, investment or family:

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1. An ownership or investment interest in any entity with which AtlantiCare has a transaction or arrangement; or
2. A compensation arrangement with AtlantiCare or with any entity or individual with which the organization has a transaction or arrangement; or
3. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which AtlantiCare is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration and gifts or favors which are substantial in nature.

Gift or Entertainment of Nominal Value will mean an item that is promotional in nature (i.e., imprinted with corporate advertising) or typically distributed widely as a promotional item to others; or, entertainment that is adjunct to a business relationship that is reasonable, occurs infrequently and is not considered to be "lavish" in nature.

Material Financial Interest will mean a Financial Interest or option to acquire a Financial Interest, either direct or indirect, that exceeds one half of one percent (0.5%) of the issued securities (stocks, bonds or loans) of an incorporated concern; or for a non-corporate concern, the ownership exceeds one half of one percent (0.5%) or involves an investment over two thousand dollars (\$2,000). This does not include participation in public investments that are not self-directed (i.e., mutual funds, annuities).

Outside Organization will mean any non-AtlantiCare corporation, partnership or other entity, including individual persons.

Related Parties will mean any individual, organization, or group in whom or in which the Board Member or Employee has a personal interest. Examples of Related Parties would include, but are not limited to the Employee's family members and relatives.

Senior Management Representative will mean the individual to whom an Employee ultimately reports (i.e., Division Administrator, Service-line Administrator, Vice President, President) within his/her respective AtlantiCare entity.

Significant Amount of Time is a difficult term to define. It may vary substantially among different individuals. Regarding the term's application to this Code, it will mean an amount of time significant enough that it would interfere with an Employee's ability to perform his/her duties and responsibilities in a timely and effective fashion.

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Solicit Business will mean any activity for the purpose of the sale of goods or services for the Employee's personal gain or for the gain of Interested Parties.

CODE OF BUSINESS

ETHICS VALUES:

Integrity -- Our actions and decisions consistently reflect the highest ethical standards. We operate on the basis of openness, to nurture an environment of honesty and trust.

Respect -- We treat each individual with dignity and compassion; encourage creativity and assist one another to achieve our fullest potential. We believe that each individual is equally important in a unique way.

Service -- We build our customer commitments upon the philosophy that quality and service will improve over time using a process of continuous quality improvement. We measure our performance against customers' standards and strive to exceed their expectations.

Teamwork -- We combine our efforts with the efforts of others to achieve the greatest success. Collaboration and open communication are essential to our relationships.

Safety -- Safety of customers and staff is our top priority. We continue to integrate new learning in quality improvement and safety management to all aspects of our environment.

RELATIONSHIPS WITH SUPPLIERS, PURCHASERS OR OTHER HEALTHCARE PROVIDERS, EDUCATIONAL INSTITUTIONS AND PAYERS:

It would be impossible to present an all-inclusive list of examples regarding Conflicts of Interest, non-Compliance or other violations of the Code. In this section, and in those that follow, are illustrations or guidelines for certain types of activities and situations that may point a Board Member or an Employee in the right direction regarding the ethical standing of a given act. In cases where a clear indication of an activity's compliance with the Code is in doubt, Employees are requested to seek written direction from their Senior Management representative or the Corporate Compliance Office, while Board Members are requested to seek written guidance from AtlantiCare corporate counsel. It could be a Conflict of Interest for Board Members, Employees or Related Parties to:

- Own a Material Financial Interest in an Outside Organization that currently does business with, is seeking to do business with, or is in competition with AtlantiCare.
- Participate as a member of the Board of Directors of an Outside Organization that currently does business with, is seeking to do business with, or is in competition with AtlantiCare.

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- Participate in managerial, consulting or other services to any Outside Organization that currently does business with, is seeking to do business with, or is in competition with AtlantiCare.
- Be employed by, or act as an agent of, an Outside Organization that currently does business with, is seeking to do business with, or is in competition with AtlantiCare.
- Be influenced by any relationship AtlantiCare may have with other healthcare providers, educational institutions and/or payers regarding the appropriate care of our patients (see ARMC Policy Number 2-285, Patient Rights and Organizational Ethics).

It could be a corporate compliance issue if you suspect that either intentionally or unintentionally:

- Bills, for medical services, are being incorrectly submitted.
- Medical services are being coded incorrectly.
- The institutions, or individual practitioners, are functioning outside of the scope of their license.
- The institution is not adhering to any law or regulation that is applicable to the operation of any of our businesses.

INDIRECT INTERESTS AND RELATIONSHIPS:

A Conflict of Interest can occur because of the business activities of Related Parties. It could be a Conflict of Interest for Board Members or Employees to:

- Personally conduct business arrangements on behalf of AtlantiCare with Related Parties, or Outside Organizations that employ Related Parties whenever the Related Parties have other than a minimal interest from such business transactions.
- Use their position in order to improperly benefit Related Parties, or other Outside Organizations.

GIFTS, LOANS AND ENTERTAINMENT:

Participation in business-related functions, including the occasional acceptance of meals from a supplier, purchaser or competitor, is a normal and generally permissible business practice. However, Board Members and Employees are obligated to exercise care to ensure that such functions are necessary and that their

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value and frequency are not excessive under the circumstances. Board Members and Employees (and/or Related Parties) should never give or accept any gifts, services, favors or entertainment that could be interpreted as a compromise of their independence or objectivity of judgment.

Examples of potential Conflicts of Interest for Board Members, Employees and Related Parties are:

- Acceptance of gifts or entertainment, other than non-cash Gifts or Entertainment of Nominal Value, from any Outside Organization that currently does, is seeking to do business with, or is in competition with AtlantiCare.
- Acceptance of loans from any Outside Organization that currently does, is seeking to do business with, or is in competition with AtlantiCare. A loan from a financial institution currently doing business with AtlantiCare is acceptable *only* if the terms of the loan are comparable to those generally available to others at the time of the borrowing.
- Purchase of items for personal use suppliers currently doing or seeking business with AtlantiCare unless the value of the items purchases are readily and objectively discernible and unless the Board Member or Employee pays fair market value (which may include any discounts generally available to like customers).

OUTSIDE BUSINESS ACTIVITIES:

AtlantiCare expects that all Employees will devote their work efforts and energies toward the accomplishment of the goals, objectives and commitments of AtlantiCare. Outside employment or business activities by an Employee and/or Related Parties should be carefully considered to ensure that they do not adversely impact an Employee's independence or objectivity of judgment. It is important for Employees to keep in mind that the appearance of a Conflict of Interest is, at times, just as damaging to the best interests of AtlantiCare as an actual Conflict of Interest. Examples of potential Conflicts of Interest for Employees are:

- Participation in an activity on a full-time, part-time, or on a free-lance basis for any Outside Organization, regardless of any business relationship (current or potential) with AtlantiCare, which would interfere with an Employee's ability to devote appropriate time and attention to their job with AtlantiCare. Any employment with an Outside Organization that involves a Significant Amount of Time must be disclosed to the Senior Management representative for written approval.
- Ownership of an Outside Organization, regardless of any business relationship (current or potential) with AtlantiCare, when the primary business activity corresponds to the Employee's job function (i.e., Cafeteria Director owning a restaurant).
- Soliciting business on behalf of AtlantiCare from Related Parties.

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- Soliciting business from Outside Organizations doing or seeking to do business with AtlantiCare.
- Soliciting business from other Employees of AtlantiCare while working.
- Buying, selling or leasing any kind of property, facility or equipment to or from AtlantiCare without the prior consent of a Senior Management Representative.

CONFIDENTIALITY:

The privacy of our patients, other customers and employees is to be respected and maintained at all times. Board Members and Employees may not disclose to any person for personal or unauthorized reasons information about our patients, other customers or employees. Accessing patient, other customer or employee information for personal or non-business reasons is prohibited.

ADVERTISING AND MARKETING:

AtlantiCare employees shall market AtlantiCare's services fairly, honestly and in stressing only their value and merits. At no time will statements be permitted in advertisements that would mislead the customer. Employees shall not use tactics, services, nor shall they unfairly undermine the services of a competitor by using disparaging comments and innuendoes.

NON-BUSINESS ACTIVITIES:

An Employee's participation in the activities of a trade association, professional society, charitable organization or governmental institution on a volunteer or non-compensated basis or holding a part-time public office will not generally cause a Conflict of Interest, unless participation involves a Significant Amount of Time. Employees should seek written guidance from the person to whom they directly report and/or their Senior Management Representative in advance of accepting such positions or participation.

POLITICAL ACTIVITIES AND CONTRIBUTIONS:

Employees are encouraged, as private individuals, to participate in the political process. However, it is considered a violation of this Code for Employees to work for a candidate or political cause during their regularly scheduled business hours, or to utilize AtlantiCare Property and/or resources for such a purpose. Additionally, an Employee, as well as a Board Member, must be careful to ensure that any personal political donations do not appear to be made from, or reimbursed with AtlantiCare funds.

COMPLYING WITH ALL LAWS:

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Board Members and Employees must comply with all applicable federal, state and local laws and the rules and regulations of all accrediting licensing, certifying and oversight bodies (common examples of compliance issues may include coding, billing, physician contracting, etc). Employees shall immediately notify a Senior Management Representative (or Corporate Compliance Office - see below) of any actual or suspected violation of all such laws, rules and regulations. AtlantiCare shall not retaliate against an employee (i.e., demotion, suspension, termination, reduction in pay or hours) who has complained, reported or objected to a practice or conduct of the organization that the employee reasonably believes is unlawful. (Board members should notify AtlantiCare corporate counsel.) Notification should normally be in written format or, if preferred, through the Compliance Phone Line at (609) 407-7788 (3-7788 internally) or by writing the Corporate Compliance Officer at 2500 English Creek Avenue, Bldg. C, Egg Harbor Township, NJ 08234. All communications will be held strictly confidential.

Strict compliance with all laws and regulations is a condition of employment and disciplinary action, up to and including termination and revocation of privileges will be enforced. Additionally, managers and supervisors are expected to use reasonable diligence in detecting non-compliance.

CLINICAL DECISION MAKING:

It is AtlantiCare's policy to protect the integrity of clinical decision making, regardless of how AtlantiCare or its component entities, compensates or shares financial risk with its lenders, employees, clinical staff and physicians. Clinical decisions will be raised on identified patient healthcare needs. Such decisions shall not be made in violation of applicable law or regulations, or AtlantiCare policies. For example, it is the policy of AtlantiCare (see ARMC Policy Number 2-350, Patient Rights and Organizational Ethics) that a patient's admission and/or transfer not be based on patient or hospital economics. Only patients whose specific condition or disease cannot be safely treated at the Medical Center are diverted, refused admission, or transferred to another hospital.

BILLING:

All initial billing includes dates of service. The bill will include charges only for those services and care provided during the time frame of service. An itemized bill will be provided upon request. Explanation of the itemized statement will be provided by patient accounts representatives in the Business Office upon patient or payer request. Any conflicts regarding the content of the bill will be answered in an effort to accomplish customer satisfaction. If the conflict is not resolved, it will be referred to the Director of Patient Accounts for attempted resolution. Any questions or complaints about patient bills will be responded to promptly. Billing complaints and efforts to resolve complaints will be documented and forwarded to Quality Management for filing and tracking.

PERSONAL USE OF AHS PROPERTY AND INFORMATION:

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It would be a Conflict of Interest for Board Members, Employees or Related Parties to:

- Compete with AtlantiCare in the purchase or sale of real, personal or intellectual property; real, personal or intellectual property rights; or, other interests or services.
- Participate in or enhance any activity that is detrimental to AtlantiCare or denies it of a legitimate profit.

It is improper and a violation of this Code (and possibly the law) for Board Members, Employees or Related Parties to:

- Take advantage of Business Opportunities that rightfully belong to AtlantiCare.
- Use or divert any AtlantiCare Property, including the services of its employees, for their own benefit or advantage.
- Exploit or disclose, for personal benefit or advantage, AtlantiCare Information obtained through their employment.
- Use AtlantiCare Identification for personal matters not directly related to the business of AtlantiCare.
- Intentionally misstate an amount, purpose or timing of financial transactions or assets to AtlantiCare or to Outside Organizations currently doing business with, seeking to do business with, or in competition with AtlantiCare, or having regulatory or licensure oversight responsibilities in regards to AtlantiCare and its affiliated entities.

RELATIONS WITH GOVERNMENT OFFICIALS AND EMPLOYEES:

Due to the extent of regulation inherent in the healthcare industry, it is common for Employees to come into contact with representatives of various federal, state and local governmental agencies that have regulatory authority over AtlantiCare and its affiliated entities. These agencies have their own policies and regulations, sometimes severe, concerning their personnel's acceptance of gifts, entertainment and services. AtlantiCare requires that its Employees inquire about, understand and comply with any policies and regulations covering gifts, entertainment and services that may be pertinent to government personnel. Circumstances may arise where Board Members come into contact with representatives of governmental and regulatory agencies in the course of representing the interests of AtlantiCare. Board Members are advised to contact Senior Management Representatives, the Corporate Compliance Office or AtlantiCare corporate counsel to inquire about relevant policies and regulations.

EMPLOYEES' OBLIGATIONS:

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Employees are required to comply with the ethical guidelines and policies presented above, and to report (in writing or through the Compliance Phone Line) any situations that they become aware of that appear to violate their understanding of the Code to their Senior Management Representative or the Corporate Compliance Office. Employees are expected to exercise care to avoid or prevent conduct that might reasonably appear to be in conflict with the best interests of AtlantiCare.

If a Conflict or potential Conflict exists but an Employee believes, because of the particular circumstances, that AtlantiCare should consider waiving such a Conflict, the Employee should contact their Senior Management Representative. A Corporate Officer is to respond, in writing to all requests for consent.

Employees who have questions as to whether an existing or potential conflict exists should seek written guidance from the Senior Management Representative or Corporate Officer. Failure of Employees to timely exercise their responsibilities as outlined above is considered a violation of this policy and therefore may result in disciplinary action up to and including dismissal from employment and civil and criminal prosecution, even for first time violations.

BOARD MEMBERS' AND CORPORATE OFFICERS' OBLIGATIONS:

I. General Policy Statement.

It is the policy of AtlantiCare that every Board Member and every Corporate Officer, as a condition of the office, be required to fully disclose any areas of Conflict including, but not limited to, any areas of Conflict in the ownership and control of any part of AtlantiCare, any health care delivery organizations that are corporately or financially related to AtlantiCare, and/or any entity that does business with AtlantiCare as defined in this policy. It is recognized that because of the varied interests and backgrounds of the Board Members, situations could arise in which a potential Conflict of Interest exists. It is also recognized that physician membership on the Board of Governors/Trustees of AtlantiCare does not, per se, constitute a Conflict of Interest.

Each Board Member, Corporate Officer, and any party with Board-delegated powers shall review his/her interests annually and shall disclose immediately and fully any Conflict of Interest that has arisen or may arise. Whenever such possible Conflicts of Interest occur and when requested, he or she shall fully and accurately complete a Statement of Possible Conflict of Interest.

II. Conflict of Interest Procedures for Board Members, Corporate Officers and Others with Board-Delegated Powers.

The following procedures will be used where a Board Member, Corporate Officer or any party with Board-delegated powers has a Conflict of Interest or potential Conflict of Interest.

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- A. Scope of Procedures. Any Board Member having any direct or indirect personal Financial Interest (defined below) in any arrangement, transaction, investment or other matter to be considered by the Board shall disclose such interest to the entire Board prior to the discussion by the Board of such matter if the matter has been placed on the agenda for the Board meeting. If such matter is raised during the course of the meeting without having previously been placed on the agenda, the interested Board Member shall notify the entire Board of his or her Financial Interest as soon as he or she becomes aware of a potential Conflict of Interest in a manner being considered by the Board.

This requirement shall apply not only to Board Members who have a current personal Financial Interest in any arrangement, transaction, investment or other matter being considered by the Board, but also to any personal Financial Interest that a Board Member believes, or may have reason to believe, he or she may have or obtain at some future date with respect to a matter under current consideration by the Board.

Each Board Member shall submit to the Chairman of the Board a statement of any existing transaction, arrangement, investment or other matter involving AtlantiCare that currently exists, in which such Board Member has any direct or indirect personal Financial Interest. Such statements shall be distributed to the

entire Board at the next regular meeting after the meeting at which these procedures have been adopted as part of AtlantiCare's By-Laws.

- B. Required Action. Upon disclosing his or her personal Financial Interest in a matter to be considered by the Board, such Board Member shall leave the meeting and not participate in the Board's consideration of the matter involving a potential Conflict between AtlantiCare and the Board Member.

No Board Member that has a personal Financial Interest in any arrangement, transaction, investment or other matter shall be allowed to vote on such matter.

The Board must approve such arrangements, transactions, investments or other matters by a majority of the members, present at a meeting that has a quorum, not including the vote of the interested Board Member or Members.

- C. Minutes. The minutes of the Board meeting shall set forth all procedures of potential Conflicts made during the course of the meeting and shall state which Board Members were present for the discussion and vote, the content of the discussion, including any discussions or alternatives to the proposed transaction or arrangement that would eliminate any Conflict of Interest, and the roll call of the vote.

- D. Procedures for Approval. In order to approve any transaction or arrangement involving actual or potential personal financial gain or loss by a Board Member or Members, the Board must find, by a

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Owner: April Jetter, Employee Relations Manager		Source:	Authorized By: Richard D. Lovering, SVP, Admin Services & CHRO
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Policy & Procedure	<i>ID No.</i>	403
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<i>Facility Scope:</i> AtlantiCare Health System	<i>Department:</i>	General

majority vote of the Board Members then in office, without counting the vote of interested Board Members:

1. That the proposed transaction is fair and reasonable to AtlantiCare;
2. That the proposed transaction or arrangement is in AtlantiCare's best interest and in the interest of the communities served by AtlantiCare;

That after reasonable investigation, which may be undertaken prior to the meeting, AtlantiCare cannot enter into a more advantageous

3. transaction or arrangement to achieve its exempt purposes with reasonable efforts;
4. That the interested Board Member or Members were not present for the discussion or vote regarding the transaction or arrangement; and
5. That the transaction or arrangement is then approved by a majority vote of the Board Member or Members, not including the interested Board Member.

- A. Dissemination. Each Board Member shall receive a copy of this Code of Business Ethics and Corporate Compliance and shall sign a statement prepared by the Board asserting that he or she has read this Code. Thereafter, each Board Member shall sign an annual statement that such member (a) received a copy of the Code of Business Ethics; (b) has read and understands the Code; (c) agrees to comply with the Code; and (d) understands that the Code applies to all committees and subcommittees having Board-delegated powers; and (e) understands that the organization is a Section 501(c)(3) organization and that in order to maintain its tax-exempt status, it must continue to engage primarily in activities which accomplish one or more of its tax exempt purposes.
- B. Application to Corporate Officers. These Conflict of Interest Procedures shall also apply to all Corporate Officers of AtlantiCare and all members of committees and subcommittees with Board-delegated powers, as modified to apply to such persons who are not also Board Members.
- C. Disciplinary Actions. Any Board Member, Corporate Officer or committee members, subject to these Conflict of Interest Procedures, who fails to comply with these Procedures, shall be subject to such disciplinary action as the Board may deem appropriate to protect AtlantiCare's best interest.
- D. Executive Corporate Compliance Committee. In order to insure that all tax-exempt organizations within AtlantiCare's health care system are operating in a manner consistent with their tax-exempt status and that their operations do not result in private inurement or impermissible private benefit, the Boards of each entity which is part of the AtlantiCare Health System Affiliate shall delegate to the Corporate Compliance Committee the responsibility to review compliance issues including:

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1. Whether compensation arrangements and benefits are reasonable and are the result of arm's length negotiations;
2. Whether acquisitions of physician practices and other provider services result in private inurement or impermissible private benefit;
3. Whether partnership and joint venture arrangements, and arrangements with management service organizations, physician hospital organizations, and other vehicles for developing an integrated delivery system conform to written policies, are properly recorded, reflect reasonable payments for goods and services, further charitable purposes and do not result in private inurement or impermissible private benefit; and
4. Whether agreements to provide health care and agreements with other health care providers, employees and third party payors serve charitable purposes.

I. Law Review. If any questions arise during the course of such periodic review, the Committee shall refer such questions to AtlantiCare's corporate counsel for resolution.

REVIEW:

This Code of Business Ethics and Corporate Compliance and Conflict of Interest Statements will be reviewed at least annually by AtlantiCare Health System's Corporate Officers, and if appropriate, presented to the AtlantiCare Health System's Board of Governors. At a minimum, the Chairperson of each AtlantiCare Affiliate Board is to be provided with a summary of disclosed Conflicts of Interest on a yearly basis.

DEFINITIONS:

AtlantiCare: AtlantiCare is defined as any and all affiliated companies of the AtlantiCare Health System, including its joint ventures operating under the AtlantiCare trademark, and captive professional services corporations such as AtlantiCare Physicians Group.

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