MEMORANDUM

TO: All UF Providers and UFJP/H Staff

FROM: Robert C. Nuss, M.D.
Dean of the Regional Campus - Jacksonville

SUBJECT: Code of Conduct

DATE: February 10, 2006

The University of Florida College of Medicine - Jacksonville, the University of Florida Jacksonville Physicians, Inc. and the University of Florida Jacksonville Healthcare, Inc. require all employees to conform to the highest ethical standards and to meet or exceed all legal obligations in the performance of their job duties. In this regard, the attached Code of Conduct has been developed to ensure our work is performed in an ethical manner and to remind us of our commitment to act responsibly and legally.

Please review the Code thoroughly. If you have questions regarding the Code or encounter any situation that you believe may violate the Code, you should immediately consult your supervisor, departmental Compliance Leader, Human Resources Department, the Office of Compliance at 904-244-2158 or the Internal Audit Department at 904-244-3440. You may also call the Billing Compliance and Corporate Responsibility Hotline at 1-877-264-2520. There will be no retribution for asking questions, raising concerns about the Code or for making a good faith report of possible improper behavior.

Your commitment to responsible and ethical conduct is expected for this organization to continue to be a recognized leader in the health care community.

Attachment
CODE OF CONDUCT

The University of Florida College of Medicine - Jacksonville, the University of Florida Jacksonville Physicians, Inc. and the University of Florida Jacksonville Healthcare, Inc. (the “Organization”) are dedicated to providing the highest level of education, research and patient care. In pursuing these missions, the Organization expects all of its employees to act ethically and legally. This Code of Conduct has been adopted to ensure that these expectations are understood and met. The basic principles of conduct and ethical behavior are as follows:

- **BE HONEST AND ETHICAL.** Every employee is expected to adhere to high ethical standards when acting on behalf of the Organization and to responsibly use and control all of the Organization’s tangible and intangible assets and resources.

- **OBEY THE LAW.** There are many laws and regulations that govern the activities of the Organization, particularly those relating to billing and accounting procedures. The Organization has developed policies to help explain these requirements. If you are not certain about what the law requires, you should ask for help. Guidance may be obtained from your supervisor, departmental Compliance Leader, the Office of Physician Billing Compliance at 904-244-2158 or the Internal Audit Department at 904-244-3440.

- **BE TRUTHFUL.** Particular care should be taken to ensure that all communications provided within the Organization and to outside agencies (including government representatives) are truthful, accurate and complete.

- **HONOR CONFIDENCES.** Our patients rightfully expect that their private medical information be handled appropriately. Confidential information relating to the Organization should also be protected.

- **REPORT CONDUCT THAT CONCERNS YOU.** If you believe that you have information about an illegal or unethical activity, you have an obligation to report such issues to your supervisor, departmental Compliance Leader, or through the confidential **Billing Compliance and Corporate Responsibility Hotline at 1-877-264-2520**. Such reports can be made anonymously.

- **OBEY THIS CODE OF CONDUCT.** All employees are expected to obey this Code of Conduct knowing that failure to do so may result in disciplinary action up to and including termination of employment.