

## CLIENT COURTESY

Courtesy makes our lives and jobs much more enjoyable. To the client, you represent DoctorsManagement. You must project a professional but pleasant attitude toward our clients. We expect a generally bright, cheerful demeanor, and a polite and respectful manner towards our clients, and a helpful attitude with your co-workers. All clients, unless they signify otherwise, will be addressed as Dr., Mr., or Ms. In the office, all consultants should be addressed as Mr. or Ms. when referring to them with our clients. Please let the office staff know how you wish to be addressed socially so that we may be respectful of those wishes. These personal touches distinguish our service as something special. We are all part of *DoctorsManagement's Public Relations Team!*

Here are some additional helpful tips to remember when dealing with clients:

- Greet clients promptly and courteously.
- Smile. Develop the ability to be cheerful, even when the situation may justify the opposite. Cheerfulness is contagious.
- Be a good listener. Let the client explain their needs or problem. Do not interrupt or express your opinion before they have had a chance to finish what they want to say. Be attentive and listen.
- Be frank and honest.
- Be friendly and professional.
- Avoid loud, boisterous, or profane language.
- Don't argue or lose your temper.
- Avoid horseplay. It destroys a professional image and is dangerous to persons and property.
- Keep promises.
- Be alert to what is happening around you.
- Show your appreciation. Say "Thank you."
- Look professional.

A small percentage of clients will, at times, be rude and abusive toward employees. This is a fact of our business and especially so in this day and age. If you are so treated, *remember*, part of your job is to "keep your cool". Most client complaints can be courteously resolved. Anything less than professional behavior is inappropriate, sets a poor example for other employees, and will not be tolerated.

## ETHICAL STANDARDS

Employees are expected to observe the highest standards of business ethics. Employees are responsible for their role in our firm. Honesty and reliability are very important and we expect to be able to trust each employee. Staff members must avoid situations where their personal interest may conflict or appear to conflict with the welfare of our clients; and should always conduct themselves in an ethical manner.

## CONFIDENTIAL INFORMATION

*Clients have a right to privacy.* As a DoctorsManagement employee, you may be in a position to observe the personal care of clients' patients and business affairs. We support the position that employees refrain from discussing observations either within or outside the firm with anyone not having a legitimate business and/or patient care reason to know. This includes discussion of sensitive office issues with your spouse. Be particularly discreet in conversations in elevators, eating places, other public areas, and in any medical center. Careless talk, rumors delightfully passed along as the truth by some employees, and information regarding client activities may result in serious harm to clients, employees, or DoctorsManagement. When you hear a rumor ask management about it. They will get the correct facts for you to the extent possible and practical. Inappropriate behavior may be cause for corrective action up to and including dismissal. Our clients put us in a position of trust and we cannot betray it.

Examples of how important the client confidentiality issue is and how easily it can be violated follows:

- If a DoctorsManagement employee goes home after work and tells his/her spouse that he/she saw a friend of theirs (by name) at the firm that day, and doesn't even reveal why the friend was there, the employee, in fact, has most likely violated the friend's privacy and committed a breach of client confidentiality.
- Another example would have a DoctorsManagement employee at a party over-hearing that a client's employee was fired from his/her job because they flunked their substance abuse test, and then coming forward and correcting the person who made that statement by stating that the terminated person did not flunk his/her test because they happened to see the results and knew for a fact that the results were negative. Even though the DoctorsManagement employee was actually defending the reputation of the person who was supposedly fired for flunking a substance abuse test, the employee most likely has violated that person's privacy and client confidentiality.

**Proprietary and trade secrets shall be considered confidential and not disclosed on social media.**

## ATTENDANCE AND PUNCTUALITY

**Regular and punctual attendance by all employees is necessary and expected.** *The fact is attendance at work is a basic requirement of your job. In addition to possessing the skills necessary to perform the job, you must be willing and able to demonstrate these skills by coming to and remaining at work on a regular basis. Absence is any time away from scheduled or expected work time. Punctuality is being at work on time and is part of good attendance. When you are late or absent unexpectedly (unscheduled absence) an extra burden is placed on fellow employees. Timely notification can help ensure arrangements to cover your assignment. A good attendance record is an indication of your conviction and interest in your job.*

All employees are expected to strive for perfect attendance by:

- Maintaining reasonable health standards and taking precautions against illness.
- Not permitting minor indispositions or inconveniences to keep you away from the job.
- Making every effort to live and work safely - *observing and practicing safety rules, both on and off the job.*
- Attending to personal affairs and obligations outside the working hours.

**If for any reason you cannot report to work when scheduled (or expected, in the case of consultants and specialists), telephone management as far in advance of your expected time as possible (Consultants and specialists may contact their administrative assistants as appropriate, and DM practice managers should contact their office). You are responsible for proper notification. Do not rely on friends, relatives, or other employees to report your absence or tardiness -- speak directly with management.**

State why you will be late, when you expect to arrive, or why you will be absent.

**If the call is not timely received by management, the absence/tardy may result in disciplinary action. However, timely notification to management of an absence/tardy by the employee does not necessarily absolve it from possible disciplinary action. An attendance/punctuality issue may not result due to the reason for the absence/tardy, but rather be due to its excessive and/or patterned frequency. Even justifiable absences/tardiness must be maintained within limits to assure adequate staffing for office operations and client service. Attendance and punctuality issues can be characterized by disruption to work flow, job not getting completed, and/or creating hardships on co-workers.**

Examples of *attendance and punctuality issues that may result in disciplinary action include:*

- a. No notification
- b. Inadequate notification
- c. Patterned or excessive tardiness/absenteeism **(with or without a physician's statement).**

All employees are expected to work when scheduled or expected unless notified the office will be closed. If you are unable to report to work during inclement weather, notify management as outlined in the inclement weather policy.

If at any time your work schedule presents a temporary hardship please discuss it with management.

Bereavement Leave, Jury Duty, Military Leave, or pre-scheduled paid time off is not considered occurrences of absence under this policy.

The firm reserves the right to request a physician's statement for any length of absence due to illness/disability. In addition, when an absence due to illness/disability is over three consecutive work days, a physician's statement may be required *releasing* the employee to return to work.

In addition to the terms outlined in this policy, excessive absenteeism for any reason may be cause for dismissal. For example, patterned absenteeism.

DoctorsManagement reserves the right to authorize or refuse a request by an employee to be absent with or without pay.

## INCLEMENT WEATHER

All employees are expected to report to work at their regular scheduled time (expected time, in the case of consultants and specialists) or as soon as possible during inclement weather. The only exception is when the office is officially closed. However, employees are expected to use good judgment and not unnecessarily endanger themselves, others, or vehicles.

When the office remains open and employees accruing vacation leave benefits are scheduled to work but unable to report, paid leave is taken if available. If no leave time is available, you will not be paid for that day.

## DRESS CODE

DoctorsManagement is proud to be looked upon as an impressive and dignified firm. We have many clients, customers, and visitors who have commented on how professional our offices and staff looks. This image is attributable to the manner of dress we use within our offices, in the offices of our clients, and in public when we are representing the firm.

DoctorsManagement currently has a dress policy allowing everyone when in the office the opportunity to dress in business casual during the work week. This offers employees a way to be more comfortable and to save money. Additionally, denim clothes can be worn on Fridays (casual Fridays). Employees who prefer to dress more formally should feel free to do so. Casual business wear encompasses many looks but it really means casual clothing that is appropriate for a professional office environment. It is clothing that allows you to be comfortable at work yet always look neat and professional.

We ask that you consider each day's activities when determining what to wear (i.e., will you be meeting with a client in the office or at their office site; will you be attending a business meeting, etc.). When visiting a client's location "preferred attire" is required. Should you have a meeting in-house with a client, vendor, etc., please determine whether "preferred attire" or "other acceptable attire" is appropriate, and let others in the office know that you are expecting guests.

Following are examples of preferred, acceptable, and unacceptable attire:

### PREFERRED ATTIRE WITH CLIENTS

**Gentlemen** - dress pants, long-sleeved shirts, ties, jackets, dress shoes

**Ladies** - Business appropriate dresses, skirts, slacks, blouses, sweaters, jackets, dress shoes with hose

### ACCEPTABLE ATTIRE AT OTHER TIMES

Obviously, this list is not intended to be all-inclusive. Rather these items should help set the general parameters for proper business casual wear and allow you to make intelligent judgments about items that are not specifically addressed. A good rule of thumb is that if you are not sure if something is acceptable, choose something else or inquire first.

**Gentlemen** - dress slacks, khaki pants, button-down shirts, cotton shirts with collar, turtlenecks, loafer type shoes with socks

**Ladies** - Dresses and sleeveless sundresses, skorts and skirts of modest length (a maximum of 4" inches above the knee) and business casual in appearance and material (e.g., cotton, rayon, silk, linen, etc.); sweaters, vests, blouses, shirts, shell blouses; professional-look sandals, open-toed shoes, casual shoes with socks

## UNACCEPTABLE ATTIRE

- Leggings, stirrup pants, tight/form-fitting attire (e.g., spandex, lycra) unless worn under a skirt of modest length.
- Denim (jeans, skirts, dresses, etc.), except on casual dress Friday or when unusual work such as moving boxes, etc. is anticipated
- Any clothes with derogatory, suggestive, potentially offensive images, words, slogans, large lettering or logos
- Tank tops, tube tops, crop tops
- Flannel and thermal shirts
- Revealing clothes including low-cut blouses and dresses, backless dresses, pants, mid-drift apparel; and spaghetti strap dresses and other clothing that allows for bare shoulders unless worn under another blouse or jacket
- Sweat/jogging pants or suits
- Sweatshirts
- Flip-flops, or beach-type sandals
- Men's sandals
- Tennis/athletic shoes

## GROOMING

- Hairstyles, makeup, perfume, hands, nails, and personal hygiene must conform to the best business standards.
- Mustaches and beards may be worn if they are full and neatly trimmed.
- Tattoos must be covered at all times, and visible body piercing jewelry must be removed.
- Accessory jewelry tends to work best when simple and classic.
- The lingering smell of cigarette smoke on an employee while on DoctorsManagement premises is strictly prohibited.

Some business environments lend themselves better to accommodating trends in fashion, hairstyle, and/or the donning of multiple pieces of jewelry, facial jewelry, body piercing, tattoos, etc. Examples of these might include retail stores, entertainment establishments, or educational settings just to name a few. However, it is the firm's position that while certain personal choices may be acceptable outside of the workplace, it is necessary while on DoctorsManagement property or representing the firm for employees to abide by this firm's expectation for acceptable dress in the workplace. What may be perceived as an unprofessional appearance may make clients, business associates, and others uncomfortable and any interference with normal work may adversely affect the level of client confidence in DoctorsManagement. ***Consequently, as determined at the sole discretion of management, any "dress" that is considered inappropriate or disruptive to the workplace may be subject to disciplinary action including termination.***

Revised: May 2013

## PERSONAL HYGIENE

Personal cleanliness is an absolute necessity. In order to assure that a consistent professional image is maintained, you must practice good personal hygiene by keeping your body clean and free from odor (including the lingering smell of cigarette smoke).

Wash your hands frequently during work time to prevent the spread of germs. Always wash your hands after restroom use.

## GRIEVANCES

Employees are encouraged to bring to management's attention any problems or grievances they may have regarding employment. We know little problems can get to be big ones if they go unresolved. Your problem will be held in confidence to the extent possible and practical, and every effort will be made to resolve any problem you may bring to management.

A positive approach to problem solving is always the best means. If you have a problem, we would like to know what solution(s) you may have to offer to correct it. We certainly want your ideas and input so that a mutually satisfying resolution can be achieved.

Like any piece of equipment or machinery, our firm cannot run efficiently and productively unless all of its components or members work in harmony with each other. Good working relationships are very important if we are to properly provide the service expected from our clients. ***Consequently, domestic problems, petty jealousies, and personality conflicts are to be left outside the office.*** Employees are expected to be courteous and friendly to each other at all times. If we disagree with one another then we do so agreeably. Further, employees who are not busy are expected to help fellow employees who are very busy without being asked to do so. All of us share a common goal of helping provide the best possible service to our clients. *Snide remarks, "backstabbing", and "cold shoulders" have no place in the office and will not be tolerated.*

First however, employees who encounter problems with other employees while at work are encouraged to strive to bring about reasonable resolutions between themselves, before asking for direct involvement of management. It is appropriate to begin by discussing the problem with the other employee(s), privately, in a positive, professional manner, with the goal of arriving at a solution that is acceptable to all. If after a reasonable period of time (approximately 2-4 days), the problem has not been resolved, a second attempt should be made to immediately resolve it. Then, if after a second attempt, the problem remains unresolved, management should be contacted.

*Problems of a serious nature (affecting or having serious potential to cause harm to an employee, client, or employer) should be immediately reported to management. No employee should feel that his or her problem(s) are too small or unimportant to take to management.*

In circumstances where adverse employment action (e.g., termination, disciplinary counseling, suspension, probation, etc.) has involved all appropriate members of management, the action will be considered final.

## UPDATING PERSONNEL RECORDS

When you began employment with DoctorsManagement, you completed various forms which contained important information. Keeping this information correct and current enables us to reach you in an emergency, forward your mail and W-2 forms, maintain your insurance and other benefits, and compute payroll deductions. Please notify administration promptly (within one week) of changes in:

- Address or telephone number
- Marital status
- Name
- Beneficiary or dependents listed in your insurance policy & 401-K Plans
- Number of dependents for withholding tax purposes
- Person to notify in case of accident

If you have furthered your education in any way, it should also be recorded in your personnel records. This is helpful in determining your qualifications for work within DoctorsManagement, as well as credentialing for stock awards from DoctorsManagement Employee Corporation.

## OPEN FILE POLICY (Personnel Records)

Management maintains a personnel record of each DoctorsManagement employee. The content of the record may include an application, contract, personal data, references and such employment reports as evaluations, commendations, reports of unusual occurrences, corrective action reports, etc.

It is the position of DoctorsManagement that all personnel records are company property. Employees of DoctorsManagement *may* be granted permission to examine relevant portions of their personnel records in accordance with the need-to-know rule, with a member of management present, and at reasonable times determined by management. Employees who have terminated employment will not be granted permission to review their personnel file without proper court documentation unless required by law.

Access to personnel records, unless authorized, is limited to upper Management.

## SOLICITATION/DISTRIBUTION

Solicitation is defined generally as any act of urging or persuading of an individual by peaceful or other means to accept a product or service for sale, a doctrine to follow, an organization to join, or to pay gratuity for services rendered. Distribution refers to the handing out or making available printed literature, pamphlets, flyers, and the like.

In order to prevent disruptions in the operations of DoctorsManagement, interference in client service, and inconvenience to employees, clients, and visitors, the following rules will apply to solicitation and distribution of literature (or other means of persuasion) on DoctorsManagement property.

**Non-employees:** Persons not employed by DoctorsManagement may not solicit or distribute literature, etc. on DoctorsManagement property for any purpose or at anytime without prior authorization by management. Such unauthorized activity should be immediately reported to management.

**Employees:** Currently, employees may solicit and distribute information as it pertains to commonly known and legitimate organizations and causes. While not an all exclusive list, examples include: United Way, Good Will, Scouts, school coupon books, charitable fund raisers, etc. However, at its discretion, the firm reserves the right to deny any solicitation or distribution practice.

## IS JOHN/JANE DOE IN TODAY?

Occasionally, an employee may be out of the office. If anyone inquires about the availability of that person, never say or imply that he/she is away *from home*, simply say they are unavailable on that day. When appropriate, attempt to connect the caller via cellular phone, take a message, or put the caller to voice mail.

## SEXUAL AND OTHER HARASSMENT

DoctorsManagement is committed to providing a professional work environment. In keeping with this commitment we strive to maintain a policy prohibiting unlawful harassment. This includes sexual harassment, and any conduct that has for the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment, and is based upon a person's protected status, such as sex, color, race, religion, national origin, age, disability or other protected group status as provided by law. Other forms of continuous behavior that is deemed at management's sole discretion as annoying, intimidating, abusive, or inappropriate is prohibited. This policy applies to all employees including supervisory and non-supervisory employees. It prohibits harassment in any form including verbal, visual, and physical harassment. This includes, but not limited to, means of communication like e-mail, faxes, handouts, and voice-mail, etc.

Sexual harassment is a behavior that undermines the integrity of the employment relationship. All employees must be allowed to work in an environment free from unsolicited and unwelcome sexual overtures, sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual harassment does not refer to occasional compliments. It refers to behavior that is not welcome, is personally offensive, reduces morale, and unreasonably interferes with employee effectiveness and work performance.

Generally, two categories of sexual harassment exist. The first, **"quid pro quo"** (something for something) may be defined as an exchange of sexual favors for improvement in an employee's working condition and/or compensation. The second category, **"hostile work environment,"** can be described as unwelcome conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment or unreasonably interfering with an individual's work performance.

Examples of sexual harassment include, but not limited to, offensive or unwelcome physical contact, lewd or sexually suggestive comments, sexual propositions, sexually-oriented teasing or kidding, jokes of a sexual nature, or any display of sexually explicit pictures, photos, cartoons, books, magazines, greeting cards, or other objects. **What you consider funny, interesting, unique or amusing may be very offensive to another person.**

All employees must respect the rights of one another and shall refrain from any behavior or conduct toward any other employee that could be interpreted as sexual harassment.

*Any employee or supervisor, who believes they have been harassed and/or intimidated by a co-worker, supervisor, or any other person, has the responsibility to promptly report the facts of the incident or incidents and the names of the individuals involved to management. You do not have to complain to the offending person -- contact another manager or physician whom you would feel comfortable. Employees are encouraged to report harassment to management before it becomes severe or pervasive. All concerns brought to management's attention will be kept confidential so far as is possible and practical. Any investigation may include interviewing the*

*individual charged, and/or witnesses. No employee shall purposely provide or make an untrue statement of fact regarding a complaint of harassment or in an investigation. Retaliation against anyone who complains of harassment or who participates in an investigation is strictly prohibited.*

Our aim is to investigate all incidents and have prompt resolutions with appropriate management personnel involved. If the firm determines that harassment did occur, appropriate disciplinary action will be taken against the offending employee, up to and including termination. If the firm does not employ the individual who harassed the employee, the firm will take corrective action to the extent practical and possible. However, if the investigation determines that the complaint is not bona fide or that the employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave false information.

If an investigation reveals that sexual harassment has occurred, the harasser may also be held legally liable for his or her actions under the state or federal anti-discrimination laws in a separate legal action.

## LOST AND FOUND

As part of our responsibility to co-workers, clients and visitors, all articles found on DoctorsManagement property must be brought immediately to management. Found articles should be clearly marked with time, place, and name of person(s) who found the article(s). Items that have been submitted for claim will be held no longer than 30 days, after which they will be disposed of in an appropriate manner.

Individuals who have articles missing should report the information immediately to management.

## TELEPHONES

DoctorsManagement understands the importance of communications in our lives. Infrequent calls to arrange transportation, calls to check on the safety of family, and other important calls are permissible. It is not the intent of DoctorsManagement to restrict access to necessary communications. To do so punishes many for what a few may abuse. However, it is management's responsibility to maintain a professional climate in the office. Frequent and lengthy personal conversations do not further this objective. Excessive calls interfere with everyone's duties -- including your own. It is unprofessional and does not set a good example for others. Remember, telephone use at DoctorsManagement is a company courtesy and not a personal privilege. **Always set a good example!**

- Please keep personal calls local and restrict them primarily during breaks, lunch, and at quitting time.
- Staff should inform all personal callers that interruptions are limited to necessary calls.
- Limit calls to three minutes.
- Patterned abuse of telephone privileges is unacceptable and subject to disciplinary action.
- To insure consistency and professionalism the telephone answering procedure is as follows:
  - a. Answer the telephone within two rings. Promptly answering the telephone establishes good rapport.
  - b. Speak clearly with a pleasant tone of voice. Over ninety percent of the time, the customer's perception of you is determined by the tone of your voice.
  - c. Identify your department and your name. This provides personal attention to the caller.
  - d. Listen carefully so you will know what your customer wants.
  - e. Follow through. Stay with the caller until he/she is satisfied. Be considerate to the caller when transferring a call; stay on the line until you reach the person to whom you are transferring. Avoid multiple transfers.
  - f. Ask the caller's permission prior to placing him/her on hold.
  - g. Be a responsible voice mail user. Always associate a name and department with your extension. Update your message to reflect current data. Acknowledge each voice mail message you receive within twenty-four hours.

## PERSONAL PROPERTY

DoctorsManagement tries to prevent loss of any kind. We urge you not to leave valuables or cash unattended. DoctorsManagement will not assume responsibility for missing items, except in circumstances where authorization has been granted to bring personal property onto the premises (e.g., personal computer).

## SMOKING, TOBACCO & E-PRODUCTS

DoctorsManagement is committed to providing a safe and healthy environment to our clients and employees. In light of this commitment, **smoking in any form (tobacco or products like e-cigarettes) and the use of chewing tobacco are prohibited while working on company property.**

Tobacco breaks including e-breaks will not be allowed. If you must use tobacco or an e-product, restrict it to your lunch hour and do so away from the office. Tobacco products, e-products, lighters and matches within sight, or the lingering smell of smoke on an employee or brought into the office is strictly prohibited.

If an employee is found to be smoking in any form through the use of tobacco products (pipes, cigars and cigarettes) or “vaping”, with e-products, using chewing tobacco products, or bringing the smell of smoke on to the premises, disciplinary action will be taken, up to and including termination.

If a client or visitor is smoking, “vaping” or using other tobacco products, kindly inform them that this is a no smoking/tobacco use facility and please refrain from its use.

Revised: April 2014

## EMPLOYEE ENTRANCE AND EXIT

As a safety precaution, please enter and exit the buildings through lighted areas. Always keep the doors locked when working after-hours. The last person in the building in the evening should confirm that all outside doors are locked and alarm system secured (if applicable).

## MAIL AND PACKAGES

Employees are asked to make provisions to have personal mail delivered to their residences rather than the office. Any package carried by an employee from DoctorsManagement is subject to inspection.

Mailing personal packages from the office (via postal service, UPS, or overnight service) is acceptable upon reimbursement to DoctorsManagement for postal rates and material costs.

## HIV/AIDS

DoctorsManagement recognizes that AIDS and HIV infection may be disabilities in accordance with its policy on Equal Employment Opportunity (EEO) and the requirements of the Americans with Disabilities Act of 1990. DoctorsManagement will strive to maintain a work environment that is responsive to the workplace issues created by AIDS and HIV infection and the concerns of employees who may request management assistance.

While there is no medical basis for employees to refuse to work with HIV/AIDS-infected employees and/ or clients during ordinary workplace contact, DoctorsManagement recognizes the unique setting of healthcare and the possible opportunities that may exist for HIV/AIDS transmission. Therefore, any concerns of our employees will be taken seriously and will be addressed with appropriate information and counseling.

## SUBSTANCE ABUSE POLICY

**I. Scope.** We are committed to providing a safe working environment for all of our employees, as well as operating in a safe, responsible and efficient manner for the benefit of our patients, our community and the public. We are also committed to complying with all applicable laws.

Recognizing that prohibited drug use and alcohol misuse and abuse (collectively referred to as "substance abuse") presents a major problem and threat to safety throughout society, and particularly in the workplace, we have developed this policy to deter substance abuse and promote a drug and alcohol free workplace. Substance abuse by employees not only threatens the health and safety of themselves, co-workers, our patients and others, but also results in increased costs through lost productivity, absenteeism, tardiness, excessive health care costs, accidents on the job, and lower morale of other employees who must work with or do the work of the substance abusers.

**II. Policy.** As a condition of employment, no employee shall manufacture, sell, distribute, dispense, possess or use a **prohibited drug** or report to work or be under the influence of a prohibited drug while at work, while on our premises, while operating our vehicles or equipment, while operating personal vehicles on Firm business or in the scope of employment, or off the job so as to affect the employee's job performance, integrity on the job, or reputation of the firm.

As a condition of employment, no employee shall report to work under the influence of **alcohol** or use or be under the influence of alcohol while at work, while on our premises, while operating our vehicles, equipment or machinery, or while operating personal vehicles on Firm business or in the scope of employment, or off the job so as to adversely affect the employee's job performance, integrity on the job, or reputation of the firm.

Abuse of **prescription drugs** (i.e., taking drugs without a prescription, taking an amount greater than prescribed, or more frequently than prescribed, or otherwise in violation of the prescription) is a violation of this policy. Intentional **falsification of a prescription** to obtain drugs is a terminable offense. Drugs prescribed by the employee's physician may be taken during work hours provided the employee can safely perform their job. The employee should notify management if the use of properly prescribed prescription drugs might impair the employee's performance. Abuse of **other substances** (i.e., glue, paint, aerosols, etc.) is also a violation of this policy.

An amount of a prohibited drug or alcohol in an individual's body equal to or higher than the cutoff levels as detected by a drug or alcohol test will be considered prohibited use and under the influence by the individual in violation of this policy. All employees must abide by this policy as a condition of hire and continued employment. **Violation of any provision of this policy will result in disciplinary action up to and including termination, even for a first offense, at our discretion.** An employee who refuses to submit to a drug or alcohol test will be considered to have failed the test in violation of this policy and will be considered insubordinate and subject to immediate termination.

An employee, who fails a test, refuses to submit to a test or otherwise violates this policy and who is not terminated may, in our sole discretion, be mandatorily referred to an **employee assistance program and/or rehabilitation program**. However, nothing in this policy shall be deemed to preclude the termination of any employee who violates any provision of this policy or any other policy or rule. Failure to follow through with the employee assistance and/or rehabilitation program may result in dismissal. We may suspend an employee without pay pending the results of a drug and/or alcohol test, and investigation/determination.

Based upon reasonable suspicion of a violation of this policy, we may also **inspect and search** an employee's office, desk, drawers, filing cabinets, equipment, and other firm property under the control of the employee, as well as employee's personal effects in or on our premises, such as parcels, packages, purses, lunchboxes, briefcases, and employee vehicles located on our premises or in firm-designated parking areas.

Any employee who is **criminally charged with or convicted of a drug or alcohol-related offense** or with violating a criminal law related to operating a motor vehicle under the influence of drugs or alcohol, while on or off duty, must report the charge or conviction to us no later than five (5) days after the individual has been charged with or convicted of such an offense. If an employee who drives vehicles as part of the job has his or her driver's license suspended, revoked, or canceled because of a criminal offense, or if the employee is otherwise disqualified from driving due to such an offense, the employee must notify us no later than one (1) day following the date notice of the suspension, revocation, cancellation, or disqualification was received by the employee.

Law enforcement, governmental, licensing, and other appropriate authorities may be notified of any violation of this policy. This policy may be amended at any time with or without prior notice to employees. Nothing herein is intended as a promise or guarantee of continued employment or to alter the at-will employment relationship.

**III. Testing Procedures.** To the extent possible and practicable, drug and alcohol testing will be conducted in accordance with the Department of Transportation Procedures for Transportation Workplace Drug and Alcohol Testing Programs, 49 CFR Part 40. However, we may modify or deviate from these testing procedures and methodology at our discretion. To ensure control, identity, integrity and accuracy of the test results, all individuals involved in the testing should follow appropriate specimen collection methods, preparation and transportation of the specimens, chain of custody procedures, analysis and reporting as specified by the **laboratory selected for analysis**. An approved laboratory will perform the tests. An independent **medical review officer** will be used to handle the test results and reporting. All individuals being tested may be required to sign authorization forms necessary to perform the test and to allow us to be advised of the results. Individuals being tested may, at their option, provide any information relevant to the test, including the identification of currently or recently used prescription or nonprescription medication or other information. This information will be treated as confidential and reviewed in interpreting and considering any positive test results.

**Drug testing** will usually consist of urine testing. Specimens may be screened for any prohibited drugs or classes of drugs and their metabolites and compounds at our discretion. A

confirmation test at or above the above cut-off levels, as established by the laboratory, is considered a positive test. Blood, hair, saliva or other testing methods may also be utilized.

**Alcohol testing** will usually consist of breathalyzer testing, and a result with an alcohol concentration of .02 or greater is considered a positive test. An employee who fails an alcohol test will be immediately removed from his or her position and suspended without pay pending disciplinary action. The employee should make arrangements to be transported home and should not drive any motor vehicle due to the positive alcohol test. If an employee who fails an alcohol test insists on driving, the proper local enforcement authorities should be notified that an employee, whom we believe may be under the influence of alcohol, is driving a motor vehicle. Blood, saliva or other testing methods may also be utilized.

All employees are subject to the following types of testing:

1. Reasonable suspicion drug and alcohol testing. Whenever we reasonably suspect that an employee's work performance or on-the-job behavior may have been affected by prohibited drugs and/or alcohol, or that an employee has otherwise violated this policy, the employee may be required to submit to a reasonable suspicion drug and/or alcohol test, as appropriate. Testing should be done as soon as possible following the determination of reasonable suspicion and the employee must remain readily available for testing once notified. If an employee fails to remain readily available for testing, that employee may be deemed to have refused to submit to a test. The employee should be transported to and from the specimen collection site. Suspicion sufficient to justify testing may be based on, but is not limited to, the following: (a) observation of drug or alcohol use or possession, or drugs/alcohol being found in an area or location controlled or used by the employee; (b) physical symptoms or manifestations of such use such as impaired motor control, loud or uncontrolled verbiage or laughter, slurred speech, glassy eyes, unsteady walk, impaired coordination, display of abnormal conduct or erratic behavior, odor, or other similar conduct, demeanor, or appearance indicative of such use; (c) display of violent or threatening behavior; (d) high rate of tardiness or absenteeism or other job performance indicators or behaviors identifiable with substance abuse; (e) a significant or continued deterioration in work performance; (f) arrest or conviction for a drug-related or alcohol-related offense, or identification as focus of a drug-related or alcohol-related criminal investigation; (g) evidence that the employee diluted or tampered with a drug or alcohol test or attempted to do so; (h) a report of drug or alcohol use, sale or possession, or violation of this policy, by a reliable and credible source; (i) the reasonable suspicion of a MRO, physician, or EAP or substance abuse professional that the employee may be in violation of this policy; (j) evidence that an employee has violated this policy; (k) information that an employee has caused, contributed to or been involved in an "accident"; and/or (l) evidence that the employee had access to stolen medications.
2. Post-accident drug and alcohol testing. Employees involved in an accident may be required to submit to a post-accident drug test. The employees involved may also be required to submit to a post-accident alcohol test if we reasonably suspect that alcohol could have been a factor in the accident. An "accident" includes any

occurrence in the workplace or in the scope of employment (a) where the employee is injured, or through the employee's actions another employee or other individual is injured, including all injuries which must be recorded on the OSHA 200 Log; (b) where an employee creates a hazardous situation which presents danger either to the employee or to another employee or individual; or (c) where an employee is involved in a crash or accident while operating our vehicle, equipment, or while operating a personal vehicle on firm business or in the scope of employment. Testing needs to be done as soon as possible following the accident. If necessary, the employee will be transported to and from the specimen collection site. If an employee who is subject to post-accident testing fails to remain readily available for testing, that employee may be deemed to have refused to submit to a test. An employee may not consume alcohol for eight hours following an accident or until an alcohol test has been conducted. Nothing herein is intended to require the delay of emergency or necessary medical attention for anyone injured or to prohibit an employee from leaving the scene of the accident for a period of time to obtain necessary assistance or necessary emergency medical care. If the employee is injured, unconscious, or otherwise unable to evidence consent to the test, we will take all reasonable steps necessary to obtain the testing specimen but will ensure that any emergency medical care is administered first. In the case of a non-emergency accident or injury that is reported after the fact, the employee may be tested then.

3. *Return-to-duty/follow-up drug and alcohol testing.* This is not an option if the employee is terminated. An employee who has entered an employee assistance program or treatment rehabilitation program and who is approved to return to work by the substance abuse professional(s) must pass a return-to-duty drug or alcohol test, as appropriate, before the employee will be allowed to return to duty and will, as a condition of the return to duty, be required to agree to reasonable follow-up testing. An employee returning to duty may be required to sign a Return-to-Work agreement before returning to work, which may include, among other things, any required follow-up testing and other conditions pertinent to that employee's continued employment. The extent and duration of the follow-up testing will depend upon the nature of the employee's position and the nature and extent of the employee's substance abuse problem. The follow-up testing will be unannounced. A return-to-duty drug test will be conducted prior to the employee returning to work, the results of which must be reported to us as negative before the employee will be allowed to return to duty. Any return-to-duty alcohol test will be conducted immediately before the employee returns to work, and the employee must have a negative test result before returning to duty.

## WORKPLACE PRIVACY

As an instrumental part of DoctorsManagement's effort to assure a theft and drug free environment, workplace searches may be conducted. The firm reserves the right to conduct searches of both person and property on or brought onto its premises. All DoctorsManagement employees are hereby notified that employees, packages, lockers, work areas, desks, etc. are subject to reasonable searches at any time, at random or upon cause as management may determine. DoctorsManagement's objective is to provide a safer and more secure environment for clients, employees, visitors and others.

- Employees may not use personal locks on company property.
- Searches in and of themselves do not imply or constitute an accusation of wrongdoing.
- Employees that refuse a search may be disciplined (including dismissal) for insubordination or refusing to cooperate in an investigation.
- Information regarding a search will be confidential and limited to management and officials on a need-to-know basis.

## INTERNAL AND EXTERNAL ELECTRONIC COMMUNICATION

### POLICY

DoctorsManagement provides and maintains the following forms of electronic communication, messaging agents and electronic facilities: Internal and external electronic mail (e-mail), telephone voice mail, Internet access, and computer hardware and software. As a condition of providing the previously identified communications access to its employees, DoctorsManagement places certain restrictions on workplace use of the same.

### OBJECTIVE

The internal communication systems, as well as the equipment and data stored, are and remain at all times the property of the firm. Accordingly, all messages and files created, sent, received, or stored within the system should be related to the firm's business and are and will remain the property of the firm.

The firm reserves the right to retrieve and review any message or file composed, sent or received. It should be noted that although a message or file is deleted or erased, it is still possible to recreate the message. Therefore, ultimate privacy of messages cannot be assured to anyone. Although electronic mail and voice mail may allow the use of passwords for security, confidentiality cannot be guaranteed. It is possible for messages to be retrieved and viewed by someone other than the intended recipient. Furthermore, DoctorsManagement knows all passwords, as the system may need to be accessed in the absence of an employee.

When utilizing e-mail, etiquette is important. The strategies for effective e-mail communication are as follows:

- Communicating urgent matters for immediate response, to communicate with several people quickly or any other time sensitive matter;
- Keeping all messages as brief as possible will minimize reading time for recipient, therefore keeping communication efficient;
- Be as complete as possible by using the simple rules of who, what, when, where and why to answer any anticipated questions;
- Avoid communicating through email on a sensitive subject that should be addressed in person; if possible, communicate confidential information in another form other than email;
- Check for accuracy and apply all good business writing, using correct grammar, spelling and punctuation;

- Follow up if a response has not been received in a timely manner;
- Read all messages and respond regularly;
- Avoid the use of typing a message in all capital letters; and
- Being careful not to use the ‘Reply All’ function when not intended.
- Ensure that messages are deleted or saved; the server should not be used to permanently store all messages

While DoctorsManagement encourages employee use of the Internet, its use is restricted to the following:

- To communicate with employees, vendors, or clients regarding matters within an employee’s assigned duties;
- To acquire information related to, or designed to facilitate the performance of regular assigned duties; and
- To facilitate performance of any task or project in a manner approved by management.

#### DEFINITIONS

The contents of e-mail, voice mail messages for any file may not contain anything that would reasonably be considered offensive or disruptive to any employee. Offensive content would include, but is not limited to, sexual comments or images, racial slurs, gender specific comments or any comments that would offend someone on the basis of their age, sex, sexual orientation, religious or political beliefs, national origin, or disability.

Regarding Internet and e-mail access and usage, be advised that use of the Internet and e-mail provided by DoctorsManagement expressly prohibits the following:

- Dissemination or printing of copyrighted materials, including articles and software, in violation of copyright laws.
- Sending, receiving, printing or otherwise disseminating proprietary data, trade secrets or other confidential information of DoctorsManagement in violation of Company policy or proprietary agreements.
- Offensive or harassing statements or language including disparagement of others based on their race, national origin, sex, sexual orientation, age, disability, religious or political beliefs.

- Sending or soliciting sexually oriented messages or images.
- Operating a business, pursuing business opportunities or soliciting money for personal gain, or searching for jobs outside DoctorsManagement.
- Sending chain letters.
- Gambling or engaging in any other activity in violation of local state or federal law.

## PROCEDURES

Disciplinary action for violation of this policy may include, but is not limited to, suspension or termination of the offending employee. In cases involving less serious violations, disciplinary action may consist of warning or reprimand. Remedial action may also include counseling, changes in work assignments, or other measures designed to prevent future misconduct. The measure of discipline will correspond to the gravity of the offense as weighed by its potential effect on the firm and fellow employees.

**Nothing in this policy should be construed to prohibit or discourage concerted activities protected under state and federal law.**

## GARNISHMENT

DoctorsManagement may be required by law to recognize certain court orders, liens, and wage assignments. When DoctorsManagement receives a notice of pending garnishment or wage assignment, management will discuss the matter with you in an effort to settle the matter before involving the company.

When a garnishment notice is received:

- The employee will be notified by management of the garnishment and the garnishment will be discussed.
- The employee should complete all forms within the allotted time frame and return them to management.
- DoctorsManagement's payroll department will process the garnishment and begin to deduct funds from the employee's paycheck when the appropriate agency serves notice to do so.

## CELLULAR/CAMERA PHONES

DoctorsManagement recognizes the importance of making and receiving phone calls and text messaging. We consider communication with the office vital and with patients and customers a hallmark of our services.

### *In-House:*

While at work employees are expected to exercise the same discretion in using personal cellular (cell) phones and text messaging as is expected for the use of our regular landline phones. Excessive personal calls and text messaging during the workday, regardless of the phone used, can interfere with employee productivity and be distracting to others. *Always use a cell phone's non-audible feature if available to notify you of an incoming call or text message.* A reasonable standard the firm encourages is to limit personal cell phone calls and text messaging during work time to no more than one per day as needed. Employees are therefore asked to make any other personal calls or text messages on non-work time where possible and to ensure that friends and family members are aware of the firm's policy. Cell phones ringing and/or non-audible features causing distractions in the office or patient care will not be tolerated. Flexibility will be provided in circumstances demanding immediate attention. The firm will not be liable for the loss of personal cell phones brought into the workplace.

### *Travel:*

The availability and use of cell phones has become instrumental to conducting business. The very nature of our work often demands accessible communication — and assuring an idyllic opportunity for every phone call may not always be possible. Nevertheless, in the interest of safety it is enough to adopt the following commonsense guidelines.

Employees who use a cell phone and text message for business are encouraged to refrain from using their phone for calls, text messaging, and/or taking notes while driving. Safety should come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are strongly encouraged to pull off to the side of the road and safely stop the vehicle before placing or accepting a call or text message. If acceptance of a call or text message is unavoidable and pulling over is not an option, employees are expected to keep the response short, use hands-free options if available, refrain from discussion of complicated or emotional discussions and keep their eyes on the road.

- Special care should be taken in situations where traffic, inclement weather or the employee is driving in an unfamiliar area.
- Preprogram frequently dialed numbers.
- Employees who are charged with traffic violations resulting from the use of their phone while driving will be solely responsible for all liabilities that result from such actions.

### *Camera Phones:*

The firm prohibits employee possession or use of cameras in the workplace, including camera phones, as a preventative step believed necessary to secure employee privacy, trade secrets and other business information.

Violators of this policy may be subject to disciplinary action.