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To send email to Griffin Hospital's Compliance Officer send to edberns@griffinhealth.org.

[Note: Confidentiality cannot be guaranteed due to the nature of electronic mail communication]

Code of Conduct of Griffin Hospital

Message from the President/CEO

"Griffin Hospital's Code of Conduct for the first time expresses our commitment of what Griffin Hospital stands for and the way we conduct our business. It reflects an attempt to state our fundamental beliefs about what the public, our patients, our customers and vendors, and what each of us as employees has a right to expect -- that Griffin Hospital will conduct its business within a framework of honesty and integrity."

Purpose

This Code of Conduct has been adopted by the Griffin Hospital Board of Trustees to provide standards by which employees of Griffin Hospital will conduct themselves to protect and promote organization-wide integrity and to enhance Griffin Hospital's ability to achieve the organization's mission.

Introduction

The Code of Conduct contains Principles articulating the policy of Griffin Hospital and Standards that are intended to provide additional guidance to persons functioning in managerial or administrative capacities. The Principles set forth in this Code of Conduct will be distributed periodically to all employees. The Principles and Standards shall be distributed annually to Trustees, officers, employees, volunteers, and medical staff members having administrative or managerial responsibilities. All employees are responsible to ensure that their behavior and activity is consistent with this Code of Conduct.

As used in this Code of Conduct, the term Griffin Hospital means Griffin Hospital, its parent Griffin Health Services Corporation, and each of its divisions, subsidiaries and operating or business units. The term "employee" includes any director, officer, employee, covered person, and volunteer who fills a role or provides services on behalf of Griffin Hospital, or any of its divisions, subsidiaries, or operating or business units.

Administration and Application of This Code of Conduct

Griffin Hospital expects each person to whom this Code of Conduct applies to abide by the Principles and Standards set forth herein and to conduct the business and affairs of Griffin Hospital in a manner consistent with the general statement of principles set forth herein.

Failure to abide by this Code of Conduct, or the guidelines for behavior which the Code of Conduct represents, or other applicable documents or policies governing employee behavior, may lead to disciplinary action. For alleged violations of the Code of Conduct, Griffin Hospital will endeavor to weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the Code of Conduct, the seriousness of the behavior, the employee's history with Griffin Hospital, and other factors that it deems relevant. Discipline for failure to abide by the Code of Conduct may, in Griffin Hospital's discretion, begin with, range from, or conclude with verbal correction and/or verbal or written warning to suspension and/or termination. In the

event that an employee is covered by the terms of a collective bargaining agreement, disciplinary procedures in accordance with the contract shall prevail.

Nothing in this Code of Conduct is intended to nor shall be construed as providing any additional employment or contract rights to employees or other persons.

While Griffin Hospital will generally attempt to communicate changes concurrent with or prior to the implementation of such changes, it reserves the right to modify, amend, or alter the Code of Conduct without notice to any person or employee.

Mission Statement

Griffin Hospital is committed to providing personalized, humanistic, consumer-driven health care in a healing environment, to empowering individuals to be actively involved in decisions affecting their care and well-being through access to information and education, and to providing leadership to improve the health of the community we serve.

Our Values

Quality and Service

Providing access to information for patients, families and the community on the nature, diagnosis and treatment of medical conditions including the full range of traditional and non-traditional therapies.

Facilitating patients to be informed participants in decisions affecting their care and well-being.

Exceeding the service expectations of patients, families, physicians and other health care providers.

Measuring, monitoring and reporting performance against service and quality standards benchmarked to the best community hospitals.

Respect and Dignity

Embracing patients and families as partners in the care process.

Treating all people with compassion.

Attending to the mind and the spirit as well as the body.

Preserving privacy and confidentiality.

Valuing positive relationships among members of the Griffin family and fostering an environment of mutual respect and support.

Collaboration

Building and sustaining collaborative working relationships with Griffin and between Griffin, other providers and community agencies.

Entrepreneurship and Innovation

Encouraging and recognizing performance leading to the development of "value added" programs and services and improvements in efficiency and effectiveness.

Stewardship

Achieving high productivity by efficient use of resources including people's time.

Remaining true to the mission by allocating resources to purposes directly supportive of the mission.

Being accountable for use of resources at all levels of the organization.

Principle 1 - Legal Compliance

Griffin Hospital will strive to ensure all activity by or on behalf of Griffin Hospital is in compliance with applicable laws.

The following Standards are intended to provide guidance to employees and management in administrative positions to assist them in their obligation to comply with applicable laws.

These standards are neither exclusive nor complete. Employees are required to comply with all applicable laws, whether or not specifically addressed in these policies. If questions regarding the existence, interpretation, or application of any law arise, they should be directed to the Vice President, Legal Affairs/Compliance Officer.

1.1 - Antitrust

All employees must comply with applicable antitrust and similar laws that regulate competition. Examples of conduct prohibited by the laws include (1) agreements to fix prices, bid rigging, collusion (including price sharing) with competitors; (2) boycotts, certain exclusive dealing and price discrimination agreements; and (3) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices. Employees are expected to seek advice from the hospital's Vice President, Legal Affairs when confronted with business decisions involving a risk of violation of the antitrust laws.

1.2 - Tax

As a nonprofit entity, Griffin Hospital has a legal and ethical obligation to act in compliance with applicable laws, to engage in activities in furtherance of its charitable purpose, and to ensure that its resources are used in a manner that furthers the public good rather than the private or personal interests of any individual. Consequently, Griffin Hospital and its employees will avoid compensation arrangements in excess of fair market value, will accurately report payments to appropriate taxing authorities, and will file all tax and information returns in a manner consistent with applicable laws.

1.3 - Fraud and Abuse

Griffin Hospital expects its employees to refrain from conduct that may violate the fraud and abuse laws. These laws prohibit (1) direct, indirect or disguised payments in exchange for the referral of patients; (2) the submission of false, fraudulent or misleading claims to any government entity or third party payor, including claims for services not rendered, claims that characterize the service differently than the service actually rendered, or claims that do not otherwise comply with applicable program or contractual requirements; and (3) making false representations to any person or entity to gain or retain participation in a program or to obtain payment for any service.

1.4 - Lobbying/Political Activity

Griffin Hospital expects each of its employees to refrain from engaging in activity that may jeopardize its tax exempt status, including a variety of lobbying and political activities.

1. No employee may make any agreement to contribute any money, property, or services of any employee at Griffin Hospital's expense to any political candidate,

party, organization, committee, or individual in violation of any applicable law. Employees may personally participate in and contribute to political organizations or campaigns, but they must do so as individuals, not as representatives of Griffin Hospital, and they must use their own funds.

2. Where its experience may be helpful, Griffin Hospital may publicly offer recommendations concerning legislation or regulations being considered. In addition, it may analyze and take public positions on issues that have a relationship to the operations of Griffin Hospital when its experience contributes to the understanding of such issues.
3. Griffin Hospital has many contracts and dealings with governmental bodies and officials. All such contacts and transactions shall be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is prohibited. Any requests or demands by any governmental representative for any improper benefit should be immediately reported to the Vice President, Legal Affairs/Compliance Officer.

1.5 - Environmental

It is the policy of Griffin Hospital to manage and operate its business in a manner that respects our environment and conserves natural resources. Griffin Hospital's employees will strive to utilize resources appropriately and efficiently, to recycle where possible and otherwise dispose of all waste in accordance with applicable laws and regulations, and to work cooperatively with the appropriate authorities to remedy any environmental contamination for which Griffin Hospital may be responsible.

1.6 - Discrimination/Harassment

Griffin Hospital believes that the fair and equitable treatment of employees, patients and other persons is critical to fulfilling its mission and strategic objectives.

It is a policy of Griffin Hospital to treat employees, patients and other persons without regard to race, creed, color, age, gender, sexual orientation, marital status, ancestry, national origin, religion, veteran's status, physical or mental handicap, or any other legally protected status.

It is a policy of Griffin Hospital to recruit, hire, train, promote, assign, transfer, layoff, recall, and terminate employees based on their own ability, achievement, experience and conduct without regard to race, creed, color, age, gender, sexual orientation, marital status, ancestry, national origin, religion, veteran's status, physical or mental handicap, or any other legally protected status..

No form of harassment or discrimination on the basis of race, creed, color, age, gender, sexual orientation, marital status, ancestry, national origin, religion, veteran's status, physical or mental handicap, or any other legally protected status will be permitted. Each allegation of harassment or discrimination will be promptly investigated in accordance with applicable human resource policies.

In addition to the foregoing, employees must refer to the policies and procedures of Griffin Hospital that address discrimination and harassment in the workplace.

1.7 - Hotline Availability

Griffin Hospital is committed to maintaining the highest standards of business ethics and legal operations. To consistently achieve those standards requires all employees to have a responsibility to assist it in combating fraud, waste, and abuse. The violation of those ethical or legal values can do substantial damage our hospital's reputation. To reinforce its commitment, a toll-free telephone number is available through which employees may report in an anonymous and confidential manner conduct or behavior they believe involves fraud, waste, and/or abuse of resources, whether related to the affairs of the hospital or of any governmental programs with which it participates.

To report a Healthcare compliance concern and to assist the prompt reporting of suspected violations without fear of retaliation, calls may be made to EthicsPoint, a confidential reporting tool for reporting fraud, abuse, and other misconduct. EthicsPoint is available 24-hours a day, 7 days a week at griffinhealth.ethicspoint.com or by phone at 833-500-1813. EthicsPoint is an easy to use, confidential way to report work-related issues involving dishonest, illegal, or unethical behavior that an employee believes may harm our patients, our fellow employees, or Griffin Health itself.

Strict guidelines and procedures protect those who wish to remain anonymous. Calls are never traced.

Employees desiring more information about EthicsPoint should contact their supervisor, department manager, a representative from Human Resources or go to griffinhealth.ethicspoint.com.

Principle 2 - Business Ethics

In furtherance of Griffin Hospital's commitment to high standards of business ethics and integrity, employees will accurately and honestly represent Griffin Hospital and will not engage on its behalf in any activity or scheme intended to defraud anyone of money, property, or honest services.

The Standards set forth below are designed to provide guidance to ensure that Griffin Hospital's business activities reflect high standards of business ethics and integrity. Conduct of employees or vendors not specifically addressed by these standards must be consistent with the content of this, Principle 2. Questions regarding ethical issues should be directed to the Vice President, Legal Affairs/Compliance Officer.

2.1 - Honest Communication

Griffin Hospital requires candor and honesty from individuals in the performance of their responsibilities and in communication with attorneys, auditors, and other professionals who might be retained to render services to or on behalf of Griffin Hospital. No director, officer, or employee shall make false or misleading statements to any patient, person, or entity doing business with Griffin Hospital about other patients, persons, or entities doing business or competing with Griffin Hospital, or about the products or services of Griffin Hospital or its competitors.

2.2 - Misappropriation of Proprietary Information

Employees of Griffin Hospital shall not misappropriate confidential or proprietary information belonging to another person or entity nor utilize any publication, document, computer program, information or product in violation of a third party's interest in such product. Employees of Griffin Hospital are responsible to ensure they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws or licensing agreements. Employees shall not utilize confidential business information obtained from competitors, including customers lists, price lists, contracts, or other information in violation of a covenant not to compete, prior employment agreements, or in any other manner likely to provide an unfair competitive advantage to Griffin Hospital.

2.3 - Fraud and Abuse

Griffin Hospital expects its employees to refrain from conduct that may violate the fraud and abuse laws. These laws prohibit (1) direct, indirect, or disguised payments in exchange for the referral of patients; (2) the submission of false, fraudulent or misleading claims to any government entity or third party payor, including claims for services not rendered, claims that characterize the service differently than the service actually rendered, or claims that do not otherwise comply with applicable program or contractual requirements; and (3) making false representations to any person or entity to gain or retain participation in a program or to obtain payment for any service.

Principle 3 - Confidentiality

Employees of Griffin Hospital shall strive to maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards. Griffin Hospital and its employees are in possession of and have access to a broad variety of confidential, sensitive, and proprietary information, the inappropriate release of which could be injurious to individuals, Griffin Hospital's business partners, and Griffin Hospital itself. Every employee of Griffin Hospital has an obligation to actively protect and safeguard confidential, sensitive, and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

3.1 - Patient Information

All employees of Griffin Hospital have an obligation to conduct themselves in accordance with the principle of maintaining the confidentiality of patient information in accordance with all applicable laws and regulations. Employees shall refrain from revealing any personal or confidential information concerning patients unless supported by legitimate business or patient care purposes. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, employees should seek guidance from management of the department or the Vice President, Legal Affairs/Compliance Officer.

3.2 - Proprietary Information

Information, ideas, and intellectual property assets of Griffin Hospital are important to organizational success. Information pertaining to Griffin Hospital's competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with employees or third parties should be protected and shared only with

employees having a need to know such information to perform their job responsibilities. Employees should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights and software are carefully maintained and managed to preserve and protect its value.

3.3 - Personnel Actions/Decisions

Salary, benefit, and other personal information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters, and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Employees will exercise due care to prevent the release or sharing of information beyond those persons who may need such information to fulfill their job function.

Principle 4 - Conflicts of Interest

Trustees, officers, committee members, and key employees owe a duty of undivided and unqualified loyalty to Griffin Hospital. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of Griffin Hospital.

All covered persons are expected to regulate their activities to avoid actual impropriety and/or the appearance of impropriety that might arise from the influence of those activities on business decisions of Griffin Hospital, or from disclosure or private use of business affairs or plans of Griffin Hospital, or from litigation in which the interests of Griffin Hospital might conflict with those of the covered person.

4.1 - Outside Financial Interests

While not all inclusive, the following will serve as a guide to the types of activities by a covered person, or household member of such person, that might cause conflicts of interest:

1. Ownership in or employment by any outside concern that does business with Griffin Hospital. This does not apply to stock or other investments held in a publicly held corporation, provided the value of the stock or other investments does not exceed 5% of the corporation's stock. Griffin Hospital may, following a review of the relevant facts, permit ownership interests which exceed those amounts if management concludes such ownership interests will not adversely impact Griffin Hospital's business interest or the judgment of the covered person.
2. Conduct of any business not on behalf of Griffin Hospital, with any vendor, supplier, contractor, or agency, or any of their Trustees, officers, or employees in which there is a reasonable likelihood that the referenced conduct could have a detrimental effect on the business and/or operations of the hospital.
3. Representation of Griffin Hospital by a covered person in any transaction in which he or she or a household member has a substantial personal interest.
4. Disclosure or use of confidential, special, or inside information of or about Griffin Hospital, particularly for personal profit or advantage of the covered person or a household member.
5. Competition with Griffin Hospital by a covered person, directly or indirectly, in the purchase, sale, or ownership of property or property rights or interest, or business investment opportunities.
6. Participation in litigation by acting as legal counsel or expert witness in which Griffin Hospital is or might reasonably be considered an adverse party.

4.2 - Services for Competitors/Vendors

No covered person shall perform work or render services for any competitor of Griffin Hospital or for any organization with which Griffin Hospital does business or which seeks to do business with Griffin Hospital outside of the normal course of his/her employment

with Griffin Hospital without the approval of the person's supervisor or the President/CEO or his/her designee. Nor shall any such employee be a director, officer, or consultant of such an organization, nor permit his/her name to be used in any fashion that would tend to indicate a business connection with such organization.

4.3 - Participation on Boards of Trustees/Trustees

1. A covered person must obtain approval from the President/CEO prior to serving as a member of the Board of Trustees/Trustees of any organization whose interests may reasonably be considered to conflict with those of Griffin Hospital.
2. A covered person who is asked, or seeks to serve on the Board of Trustees/Trustees of any organization whose interest would not impact Griffin Hospital (for example, civic [non-governmental], charitable, fraternal and so forth) will not be required to obtain such approval.
3. All fees/compensation (other than reimbursement for expenses arising from Board participation) that are received for Board services provided during normal work time shall be paid directly to Griffin Hospital, unless such service and compensation has been approved by the President/CEO, or, in the case of the President/CEO, by the Chairman of the Board of Trustees of Griffin Hospital.
4. A covered person must disclose all Board of Trustees/Trustee activities in the annual Conflict of Interest disclosure statement.
5. Griffin Hospital retains the right to prohibit membership on any Board of Trustees/Trustees where such membership might reasonably be considered to conflict with best interests of Griffin Hospital.
6. Questions regarding whether or not Board participation might present a conflict of interest should be discussed with the President/CEO.

4.4 - Honoraria

Employees are, with the permission of their supervisor, encouraged to participate as faculty and speakers at educational programs and functions. However, any honoraria in excess of One Hundred Dollars (\$100) shall be turned over the Griffin Hospital unless the employee used paid time off to attend the program or that portion of the program for which the honoraria is paid, the program/function did not occur during normal work time, or if otherwise provided under an Employment Agreement, or approved by the President/CEO, or, in the case of the President/CEO, by the Chairman of the Board of Trustees of Griffin Hospital.

Principle 5 - Business Relationships

Business transactions with vendors, contractors, and other third-parties shall be transacted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

The Standards set forth below are intended to guide key employees in determining the appropriateness of the listed activities or behaviors within the context of Griffin Hospital's business relationships, including relationships with vendors, providers, contractors, third-party payors, and government entities. It is the intent of Griffin Hospital that this policy be construed broadly to avoid even the appearance of improper activity or other improprieties. If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, you should contact your supervisor, the Vice President, Legal Affairs/Compliance Officer, or the President/CEO.

5.1 - Gifts and Gratuities

It is Griffin Hospital's desire to at all times preserve and protect its reputation and to avoid the appearance of impropriety. Consequently,

1. Gifts from Patients. Employees are prohibited from soliciting tips, personal gratuities, gifts from patients, and from accepting monetary tips or gratuities. However, employees may accept gratuities and gifts of a nominal value from patients. If a patient or another individual wishes to present a monetary gift, he/she should be referred to the hospital's development office.
2. Gifts Influencing Decision-making. Employees shall not accept gifts, favors, services, entertainment, or other things of value in excess of nominal value, in the aggregate, nor to the extent that decision-making or actions affecting Griffin Hospital might be influenced. Similarly, the offer or giving of money, services, or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person by Griffin Hospital is absolutely prohibited. Griffin Hospital does not define 'nominal' in terms of specific dollar value. Rather, Griffin Hospital expects its employees to exercise good judgment and discretion in accepting gifts. Any such conduct must be reported immediately either to the President/CEO or to the Vice President, Legal Affairs/Compliance Officer.
3. Gifts from Existing Vendors. Employees may retain gifts from vendors which have a nominal value in the aggregate. Griffin Hospital does not define 'nominal' in terms of specific dollar value. Rather, Griffin Hospital expects its employees to exercise good judgment and discretion in accepting gifts. If an employee has any concern whether a gift should be accepted, the employee should consult with his/her department head, the Vice President, Legal Affairs and Compliance Officer, or the President/CEO or, in the case of the President/CEO, by the Chairman of the Board of Trustees of Griffin Hospital. To the extent possible, these gifts should be shared with the employees' co-workers. Employees shall not accept excessive gifts, meals, expensive entertainment, or other offers of goods or services which have more than the value as stated above, nor may they solicit gifts from vendors, suppliers, contractors, or other persons.
4. Vendor-Sponsored Entertainment. At a vendor's invitation, an individual may accept meals or refreshments at the vendor's expense. Occasional attendance at a local theater or sporting event, or similar entertainment, at vendor expense may

also be accepted. In most circumstances, a regular business representative of the vendor should be in attendance with the employee.

5.2 - Workshops, seminars and training sessions

Attendance at local, vendor-sponsored workshops, seminars, and training sessions is permitted. Attendance, at vendor expense, at out-of-town seminars, workshops, and training sessions is permitted only with the approval of an employee's supervisor, or, in the case of officers, by the President/CEO.

5.3 - Contracting

Employees may not utilize "insider" information, (i.e., that information about the business of the hospital learned while an employee of Griffin Hospital), for any business activity conducted by or on behalf of Griffin Hospital. All business relations with contractors must be conducted at arm's length both in fact and in appearance and in compliance with Griffin Hospital's policies and procedures. Employees must disclose personal relationships and business activities with contractor personnel that may be construed by an impartial observer as influencing or potentially influencing the employees' performance or duties. Employees have a responsibility to obtain clarification from management on questionable issues that may arise and at all times to comply, where applicable, with the Griffin Hospital's conflict of interest policy.

5.4 - Business Inducements

Employees of Griffin Hospital shall not seek to gain any advantage through the improper use of payments, business courtesies, gratuities, or other inducements. Offering, giving, soliciting, or receiving any form of bribe or other improper payment is prohibited.

Appropriate commissions, rebates, discounts, and allowances are customary and acceptable business inducements provided that they are approved by Griffin Hospital's management and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to whom the original agreement or invoice was made or issued. Such payments should not be made to individual employees or agents of business entities.

In addition, employees may provide gifts, entertainment, and meals of nominal value to Griffin Hospital's customers, current and prospective business partners, and other persons or entities when such activities have a legitimate business purpose, and are reasonable and consistent with all applicable laws.

Principle 6 - Protection of Assets

All employees will strive to preserve and protect the corporation's assets by making prudent and effective use of Griffin Hospital's resources and properly and accurately reporting its financial condition.

The Standards set forth below are intended to guide key employees by articulating Griffin Hospital's expectations as they relate to activities or behaviors that might impact Griffin Hospital's financial health or that reflect a reasonable and appropriate use of the assets of a nonprofit entity.

6.1 - Internal Control

Griffin Hospital has established policies and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable. All employees of Griffin Hospital share the responsibility for maintaining and complying with required internal controls.

6.2 - Financial Reporting

All financial reports, accounting records, research reports, expense accounts, time sheets, and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of Griffin Hospital and may be in violation of applicable laws.

6.3 - Travel and Entertainment

Travel and entertainment expenses should be consistent with the employee's job responsibility and the organization's needs and resources. It is Griffin Hospital's policy that an employee should not suffer a financial loss nor a financial gain as a result of business travel and entertainment. Employees are expected to exercise reasonable judgment in the use of Griffin Hospital's assets and to spend the hospital's assets at least as carefully as they would spend their own. Employees must also comply with Griffin Hospital's policies and procedures relating to travel and entertainment expenses.

6.4 - Personal Use of Corporate Assets

All employees are expected to refrain from converting assets of the organization to personal use. All property and business of the organization shall be conducted in the manner designed to further Griffin Hospital's interest rather than the personal interest of an individual employee. Employees are prohibited from the unauthorized use or taking of Griffin Hospital's equipment, supplies, materials, or services. Prior to engaging in any activity on company time which will result in remuneration to the director, officer, or employee or the use of Griffin Hospital's equipment, supplies, materials, or services for personal or non-work related purposes other than for occasional necessity, employees shall obtain the approval of the appropriate business unit or other senior management.

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[Note: Senders of email should be aware that confidentiality cannot be guaranteed due to the
nature of electronic mail communication]