

GALEN
MEDICAL GROUP

Wisdom. Compassion. Integrity.

**Employee
Handbook
2019**

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MISSION STATEMENT

“Our mission is to elevate the health of our community through multiple medical specialties providing excellent care delivered with wisdom, compassion, integrity and a commitment to technology, education and scientific inquiry”.

INTRODUCTION

The Galen Medical Group (Galen) was founded as a multispecialty medical group to meet the goals set forth in its Mission Statement. Today, Galen is on the cutting edge of the health care industry, with a strong focus on service excellence to our patients and other clients. We provide the components - quality and cost efficient medical care, coordination of health care services, community health plans, and excellence in teaching - to meet the rapidly changing health care needs of our community.

But we do more than that. By reaching out to work with local employers, managed care companies and insurance companies, we are striving to establish high quality cost effective health care plans which will become the standards of medical care and health care delivery in Chattanooga and the surrounding areas. We are providing leadership in developing the manner in which patient care will be delivered and financed in the future. This leadership involves all of us at Galen. As we go about our daily duties we are setting the standards by which we and others will be judged.

At Galen we treat our patients and clients the way we would like to be treated: with **courtesy, sincerity, caring, and punctuality**. We recognize that our business is based on service and we make sure that our entire staff focuses on achieving our service excellence as defined both by Galen and its patients and clients.

Most importantly, Galen is you. As a service company, Galen is nothing more, or less, than the individual employee or collection of employees providing the service. Therefore, it is of the utmost importance to Galen to create a positive environment to foster productive, helpful and courteous employees.

You are strongly encouraged to take the Galen service excellence philosophy seriously. Please look for ways to improve our service. We are seeking employees who want to improve and strengthen Galen as a company, and, at the same time, improve the working environment for the employees. Our future is based on today's service.

Galen Medical Group
Executive Committee

WHO IS A PATIENT?

A PATIENT is someone who is seeking one or more of the many services our group offers. He will satisfy his desire either here or with one of our competitors.

A PATIENT is the most important person whoever enters our group. He is truly a V.I.P. and worthy of the most "brilliant service" we can give, for he buys the services we have for sale. He furnishes the most for our operating expenses, including our wages, and the interest in the enormous investment which makes our employment possible. His wish should be our command.

A PATIENT is not an interruption in our work. He is the purpose of it. We are not doing him a favor by serving him. He is doing us a favor by giving us the opportunity to do so.

A PATIENT is not just another name on our books - a cold statistic. He is a flesh-and-blood human being with feelings and emotions like our own, and with his own likes and dislikes, biases, and prejudices.

A PATIENT is not someone to argue or match wits with. You can't win an argument with a PATIENT. If you win, you lose, for no one ever likes to be proved wrong or have his judgment questioned. Prove him wrong, and he will patronize our competitor.

A PATIENT is always right in his own mind and while he is our PATIENT, we had better get over on his side of the fence and look back at ourselves and our services. We may see things in a different light.

A PATIENT is a person who brings us his wants. It is our job to satisfy them profitably to him and to ourselves. Winning his interest, respect, admiration, and goodwill by our "brilliant service" to him will do much to invite his continued patronage.

A PATIENT is willing to pay fairly for the services he receives. He doesn't like to be overcharged nor underserved. The more brilliant the services rendered to him, the better will be his attitude toward our group.

A PATIENT is the reason for our being in business, and keeping this in mind will help bring success to our practice and to us as employees.

PHILOSOPHY OF GROUP PRACTICE

Because Galen is a group of medical doctors engaged in group practice, it offers greater advantages to both patients and physicians. Such combined practice makes possible the presence of many medical specialties and ancillary services within one group. It allows easy contact between physicians and convenient referral of patients from physician to physician. Important, too, are the high standards of medical practice which are established in groups. Doctors of Medicine deal in a service to mankind; they deal with the ill and distressed who come to them for help and guidance. The corollary of this statement clearly spells out the basic philosophy of the group, namely, to provide those who come to us with the most courteous, sympathetic treatment, and with the highest quality of medical care available, at a cost that is both fair and reasonable.

The growth and reputation of the group is based on such a tradition. Without such a philosophy our existence is not justified.

Your employment with us automatically carries with it certain just and equitable responsibilities. It is necessary that we all strive to maintain the high standards associated with the philosophy and tradition of group practice.

GALEN **(c. 129 - c. 200)**

Galen Medical Group is proud to have named our corporation after a Greek physician known as Galen. For nearly fifteen hundred years, Galen's works were the unimpeachable authority on medicine in many different lands.

Galen's writings included the subjects of anatomy, physiology, pharmacology, pathology, therapy, hygiene, dietetics and philosophy. He concentrated on anatomical details to the extent that his studies were considered pioneering. Galen was first to show that veins are connected to the heart, but that nerves arise from the central nervous system. Galen was a physician who understood the uncertainties and fears of the sick, as well as the interrelations of emotions and bodily systems.

Galen's extensive travels and experience coupled with his style of leaving no questions unanswered or unaddressed added to his value as an instructor during his own time and through the ages. His teachings and theories were virtually unequalled and unchallenged until the sixteenth century.

At Galen Medical Group, we strive to uphold the legacy of dedication exemplified by Galen, the physician. Our Mission Statement reflects this dedication.

HISTORY OF GALEN MEDICAL GROUP, PC

Galen Medical Group was founded in October 1992 by the merger of Plaza Cardiology Consultants and Chattanooga Academic Associates. This merger formed the first and remains to be the largest multispecialty group in Chattanooga. When the group was formed, the practice had 12 physicians; we now have over 90 physicians and advanced practice providers.

Currently, we have numerous locations and the following services at Galen: Dermatology, Gastroenterology, Hepatology, Internal Medicine, Internal Medicine & Pediatrics, Obstetrics & Gynecology, Pediatrics, Ophthalmology, and Allergy & Asthma. Ancillary services offered are Diabetic Education, Health & Wellness, Laboratory, Ultrasound, Holter Monitoring, Pulmonary Function Tests, Bone Density Testing, Lipid and Coumadin Clinics, a Histology Lab and an Endoscopy Suite. In addition, Galen is proud to have Physician Assistants and Nurse Practitioners as part of our family.

Galen Medical Group offers several site locations to service our patients' needs. Facilities are located on Gunbarrel Road, Downtown, East Brainerd, Hixson, Ringgold, Dalton, Ooltewah, South Pittsburg, and Cleveland.

EQUAL EMPLOYMENT OPPORTUNITY POLICY

Galen Medical Group is committed to compliance with federal, state and local laws prohibiting discrimination. The Group does not discriminate in hiring, promotion, discipline, termination, compensation, benefits, training, or other terms, conditions or privileges of employment or services or programs on the basis of race, color, religion, creed, national origin, (physical, mental or visual) disability, age (forty years or older), veteran or military status, genetic information, sex or gender (including pregnancy, sexual orientation or gender identity), or any other characteristic protected under applicable federal, state or local law. Any employee who believes that he or she or a class of individuals has been subjected to discrimination should follow the Complaint Procedure in the Anti-Harassment Policy.

EMPLOYMENT “AT WILL”

It is the policy of Galen that all employees are employed “at will”. This means that any employee, or Galen, can terminate the employment relationship at any time for any reason, with or without cause or advance notice. Only the Board and/or Management Committee has the authority to enter into a contract of employment on any other terms and can only do so in writing signed by the employee and the Board and/or Management Committee designee. Nothing in this Employee Handbook is intended to or should be read to alter or modify “at will” employment relationship which Galen maintains with its employees.

The policies stated in this handbook are intended as guidelines only and are subject to change at the sole discretion of Galen. This handbook should not be construed as and does not constitute a contract guaranteeing employment for any specific duration. The terms and provisions of this employee handbook should not be construed to and do not constitute express or implied contractual terms obligating Galen. It should be noted that some departments may have more stringent guidelines than what is in this handbook.

IMMIGRATION REFORM AND CONTROL ACT

In compliance with the Immigration Reform and Control Act of 1986 (“IRCA”), and other applicable federal, state or local laws, Galen is committed to employing only individuals who are authorized to work in the U.S., and not to discriminate on the basis of national origin or citizenship in hiring, recruiting or terminating employees. Any offer of employment by Galen is contingent on verification of the employee’s identity and work authorization. All employees must complete Section 1 of the Form I-9 required under IRCA not later than the first day of employment, and must present acceptable original and unexpired documents listed in the Form I-9 no later than the third day after starting employment. Galen participates in E-Verify, which is a federal government system used to verify the employment authorization and social security number of each new employee. As an E-Verify employer, Galen must submit Form I-9 data, including the employee’s social security number to the E-Verify system for verification, no later than the third day after employment begins.

BACKGROUND CHECKS

Galen Medical Group requires applicants and employees to satisfactorily complete a background check. Galen will consider your job duties, among other factors, in determining what constitutes satisfactory completion of the background check. Because Galen is a medical practice serving patients, individuals with certain criminal backgrounds (including, but not limited, to those with pending or conviction of violent crimes or listed on the Sex Offender Registry) are not suitable for employment with Galen. All information obtained as a result of a background check will be used solely for employment purposes.

When a background check is required, you must complete Galen’s authorization form. Failure to timely complete an authorization may result in termination of Galen’s consideration of your application. Falsification or omission of information may result in denial of employment or discipline, up to and including termination.

All background check information will be kept confidential. Galen complies with all applicable federal, state, and local laws regarding background checks.

The Human Resources Department is responsible for the administration of this policy. If you have any questions regarding this policy or if you have any questions about background checks that are not addressed in this policy, please contact the Human Resources Department.

MANAGEMENT RIGHTS AND RESPONSIBILITIES

The Shareholders, Board of Directors and Managers of Galen Medical Group are vested with the exclusive right to exercise the customary functions of management. These include, but are not limited to, the right to manage and control the premises and equipment; the unrestricted right to select, hire, promote, assign, train, suspend and dismiss employees; to

determine supervisory personnel; to supervise and discipline employees; to determine and change starting times, quitting times and shifts; to transfer employees within departments or into other departments and other classifications; to determine and change size, composition and qualifications of the work force; to establish, adopt, change and abolish policies, procedures, practices, rules and regulations; to determine and modify job descriptions and performance appraisals; to institute and change job classifications; to contract work out; to determine and change methods and means by which its operations are to be carried out; to assign duties to employees in accordance with the needs and requirements determined by the group; to interpret policy; and to carry out all other ordinary functions of management.

PHYSICIAN PRACTICE COMPLIANCE PROGRAM

Code of Conduct

The following statement of practice policy constitutes the Code of Conduct of Galen. It affirms Galen's corporate policy of conducting its business and operations in accordance with both the law and the highest standards of business ethics. Compliance with these provisions is of critical importance. However, these standards will not dispense of the need to become familiar with applicable laws and Galen policies/protocols. If the Compliance Program does not address a particular circumstance or issue, please discuss with the Compliance Officer.

- a. The practice requires compliance with all laws and regulations to which Galen is subject and Galen's own policies and procedures. When the application of a law, regulation, or policy is uncertain, the guidance and advice of Galen's Compliance Officer shall be sought.
- b. The practice is dedicated to providing medically necessary health care to patients without regard to color, religion, creed, national origin, (physical, mental or visual) disability, age (forty years or older), veteran or military status, genetic information, sex or gender (including pregnancy, sexual orientation or gender identity), or any other characteristic protected under applicable federal, state or local law. Treatment decisions will be made in accordance with clinical need and with applicable laws and regulations, including a commitment to submit accurate claims consistent with such requirements.
- c. It is our policy to maintain contacts with governmental officials and other government personnel, whether directly or indirectly, as proper business relationships. Such contacts must never suggest undue influence upon such persons or cast doubt on Galen's integrity. Furthermore, Galen is committed to ensuring the accuracy of all filings with the government.
- d. Galen maintains accurate and reliable corporate records which disclose disbursements and other transactions to which Galen is a party. All confidential patient and business information shall be safeguarded and shall not be used for personal benefit or gain.

e. Galen requires the undivided loyalty of its employees in the exercise of their practice responsibilities. Except as may be approved otherwise by the Compliance Officer and/or Compliance Committee, personal investments or other activities which may create, or give the appearance of, a conflict of interest are to be avoided. Here are some other ways in which conflicts of interest could arise:

- Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Galen Medical Group.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for an outside commercial company or organization.
- Owning or having a substantial interest in a competitor, supplier or contractor.
- Having a personal interest, financial interest or potential gain in any Galen transaction.
- Placing company business with a firm owned or controlled by a Galen employee or his or her family.
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Galen employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the Compliance department.

f. Galen requires prompt reporting of violations of law, ethical principles, and our policies and procedures to Galen's Compliance Officer or Supervisor. Galen requires full cooperation with audits and investigations. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith and will respect the confidentiality and anonymity with respects to such disclosures.

g. Galen is dedicated to maintaining a healthy and safe environment. A safety manual has been designed to educate you on safety in the workplace. If you do not know where to locate a copy of this manual, please see your Practice Manager.

Galen Medical Group takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal

- Does what I am doing comply with Galen's guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- Is this the right thing to do?

Galen has adopted the foregoing Code of Conduct. All partners, employees, and contractors are expected to adhere to its terms. Galen has developed a “Confidential Compliance Hotline” for employees to leave confidential voice mail messages regarding non-compliance of items a-e above. This number may be accessed by calling (423) 308-0280, option 8 or you can email at compliance@galenmedical.com. Compliance directors will be the only personnel who retrieve the messages and all messages will be treated confidentially, except to the extent necessary to conduct any related internal investigation or as otherwise required by law.

EMPLOYEE WORK CLASSIFICATIONS/CATEGORIES AND BENEFIT ELIGIBILITY

Galen Medical Group has a policy of maintaining appropriate classifications of employees to make sure that all legal requirements are maintained so that there is no discrimination in terms of benefit plan eligibility and payment of compensation in accordance with federal and state laws. The purpose of this procedure is to define the company’s employee classifications for benefit plan eligibility. Practice Managers are responsible for advising Human Resources and requesting changes in status as well as extensions in employment situations where specified periods are being exceeded.

Full-time Classifications

Regular (FT) — Employed on a regularly scheduled 36 – 40 hours per week basis for a non-specified period.

Benefit Plan Participation — FT employees are eligible to participate in all benefit plans the company offers once eligibility requirements have been met. All health benefits will be available the first of the month following 30 days. Earned time off (ETO) will start accruing after 90 days and 401k participation will begin after one year of service and 1,000 hours are worked during that period.

Pro-Rated (PFT) – Employed on a regular scheduled 30 – 35 hours per week basis for a non-specified period.

Benefit Plan Participation — PFT employees are eligible to participate in all benefit plans the company offers once eligibility requirements have been met. In compliance of the Affordable Care Act, all Health benefits will be available to new hires on the first of the month following 30 days.

Employees must work at least 30 hours weekly to be eligible for our ETO benefit. ETO will begin accruing after 90 days of employment.

Employees may participate in Galen’s 401k Retirement Plan and receive the company contribution after one year of service and 1,000 hours are worked during that period of time.

Part-time Classifications

Part-Time (PT) — Employed on a regularly scheduled basis which is less than 30 hours per week but equals or exceeds 15 hours per week for a non-specified period.

Benefit Plan Participation — PT employees are not eligible to participate in most of the benefit plans Galen offers. However, should the PT employee work at least 1,000 hours in one year, they would be invited to participate in Galen’s 401k Retirement Plan and receive our company contribution.

PRN – Employed for a non-specified period on an “as-needed” basis with no commitment to number of hours per week.

- If an employee works at least 10 hours in a month, they will be required to complete Galen’s Compliance annual training.
- PRN employees must have time worked every 180 days, otherwise they will be considered inactive and employment will be terminated. Once employment is terminated, employee must go through the rehire process. See Galen’s rehire policy for conditional requirements.

Benefit Plan Participation – Employees under this classification are not eligible to receive any benefits.

Introductory / Evaluation Period

The first ninety (90) days of employment are considered an evaluation period for the Group and the employee. Prior to or upon completion of the introductory period the manager will evaluate the employee's performance to determine if he/she will be hired as a regular employee. The introductory period may be extended an additional 90 days when recommended by the manager. The first day of work will be classified as the date of employment. An employee’s satisfactory completion of this introductory or evaluation period will not alter his or her at-will employment status. All employees of Galen, including those employed during or after this introductory or evaluation period, are employees at will, which means that either Galen or an employee may terminate his or her employment relationship at any time, with or without cause, and with or without notice.

EMPLOYEE RECORDS

Galen relies upon the accuracy of information contained in employment applications, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in Galen's exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

Updating Information

It is important that your personnel records be kept accurate and up-to-date. It is the employee's responsibility to update his/her information in the Paycom Employee Self-Service system for changes related to:

- Address
- Telephone number or email address
- Person to contact in the case of an emergency
- Dependent Information
- Beneficiary Information
- Direct Deposit
- Tax Profile(s)

For a name change or change in marital status a "status change" form will need to be completed and submitted to the Human Resources Department at HRhelpdesk@galenmedical.com. Evidence of a name change, i.e. marriage license, divorce decree, etc. is required along with an updated copy of your social security card.

LICENSURE & CERTIFICATION

Galen believes in an atmosphere that encourages active employee participation and ensures maximum use of employees' skills and abilities. For this reason, all non-licensed clinical personnel (example, but not limited to, medical assistants and phlebotomists) must be certified by an accredited agency.

New hires have 90 days to provide evidence of certification. Licenses, however, must be provided prior to the date of hire.

As required by law, licensed practical nurses, registered nurses, and advanced practice providers must have an active license to practice in all applicable states.

Evidence of certification and licensure is required. Practice Managers are required to maintain valid Certificates and Licenses for all clinical personnel. Copies of renewed certificates and licenses should be sent to the Human Resources Department at HRhelpdesk@galenmedical.com for inclusion in the HR Information System. Monthly reports will be generated from ICM to assist with tracking expiration dates.

Upon notification of an expired license/certification to an employee by the Practice Manager, the employee must:

Licenses: Must be renewed immediately.

Certifications: One week to renew or employee will be suspended until renewed.

The suspension time period will not exceed two weeks. The employee may use ETO if available, and meets the ETO guidelines.

EDUCATIONAL REIMBURSEMENT

Galen Medical Group supports employees who wish to continue their education to secure increased responsibility and growth within their professional careers. In keeping with this philosophy, Galen has established a reimbursement program for expenses incurred through approved institutions of learning.

POLICY:

- A full-time, regular employee who has completed one (1) year of service, is eligible for participation in this program.
- The course(s) must be:
 - job related, or
 - offer growth in an area related to the employee's job, or
 - lead to promotional opportunities within Galen
- Reimbursement maximum is \$1,500 per calendar year.
- Course(s) must be through an accredited program. This education may include college credit courses, continuing education unit courses, seminars and certification tests.
- Employee must secure a passing grade of "B" or better for graduate course(s); and a grade of "C" or better for undergraduate course(s), or obtain a certification to receive any reimbursement.
- Expenses must be validated by receipts, and a copy of the final grade card or certification must be presented to show hours or certification received.
- Employee must work six (6) months post reimbursement for every \$500.00 of educational dollars received.
- If employee terminates employment with Galen prior to the six (6) months for every \$500.00 reimbursed, the employee will be required to reimburse Galen a prorated amount.

PROCEDURE:

To receive tuition reimbursement, employees should follow the procedure listed below:

1. The employee will provide his/her Practice Manager with information about the course for which he/she would like to receive reimbursement.
2. The employee will complete the pre-approval section of the educational assistance application and obtain appropriate signatures.
3. The employee will submit the form to the Director of Human Resources for review/approval. A copy will be added to the employee's file. The employee will maintain the original until he/she has completed the course. The employee can now enroll in the course.

4. After completion of the course, the employee will resubmit the original educational assistance application with the reimbursement section completed, including appropriate signatures, as well as receipts and evidence of a passing grade or certification attached.
5. The Human Resource Director will coordinate reimbursement with the Accounting/Payroll Department.

TRANSFERS AND PROMOTIONS

It is the intent of Galen Medical Group to provide career advancement opportunities through the promotion and transfer of qualified employees in accordance with their performance record. Giving primary consideration to qualified employees for job openings leads to improved morale and motivation which is beneficial to both the employee and Galen. The following provisions apply to non-management employees.

A. Interested employees must submit an application or resume along with a cover letter indicating the position of interest to the Human Resources Department for a promotion or transfer.

1. Prior to submitting the request, it is preferable, the employee notify the current manager of his/her decision to request the promotion or transfer.
2. Employees on probation or in their first six months of employment, are not eligible to apply for a promotion or transfer outside of their site.

Exception: A float pool employee with a satisfactory performance record may apply for a promotion or transfer during the introductory period.

3. Qualified employees are recruited and given consideration for exempt and management positions. As a general rule these positions do not require posting.

B. Criteria for selection are given in the following order:

- a) experience, skills and education;
- b) job performance;
- c) seniority

The first 90 days in the new position will be an introductory period to allow the employee and the manager time to evaluate the position and performance of the employee.

If an employee is selected for a position at a different site the employee must:

- A. Remain available to the current manager for work follow-up for up to 3 months after the transfer.
- B. If a non-management employee has previously transferred within six months, he/she is not eligible for transfer for one year.

RESIGNATIONS

If you should resign your employment, Galen requests at least two-weeks advance written notice if you are a non-exempt hourly employee and one-month advance written notice if you are an exempt salaried employee. However, you may resign at will, at any time, with or without cause or advance notice. No ETO may be scheduled and/or used during the notice period. The notice period shall be used to assist the corporation with finding a replacement for the employment opening, as well as finalizing all paperwork as required by one's duties.

All resignations must be in writing with the employee's signature and submitted to your Practice Manager. Practice Managers are required to notify the Human Resources Department immediately upon receipt of a resignation letter.

FINAL PAYCHECK

Your final paycheck will include accrued pay for time worked through your last day, as well as any earned but unused ETO at the appropriate vesting level and appropriate payout amount as outlined under the subheading Resignations. Also, additional deductions for any elected insurance benefits will be increased in order to continue such coverage through the end of the month of termination.

For continued health insurance coverage after termination, a certified letter will be mailed to your last known address informing you of your rights under the Consolidated Omnibus Reconciliation Act (COBRA).

EXIT INTERVIEW

Galen believes information obtained from an exit interview is of vital importance and assists in analyzing our employee retention and turnover. For this reason, your Practice Manager may conduct an exit interview, as well as the Human Resources Department. Responses are treated as confidential and will not become a part of your personnel file.

REHIRING CRITERIA FOR ALL CANDIDATES

To be considered for rehire, all former employees must:

- Have resigned from their earlier employment with timely notice in compliance with Galen policy;
- Received performance evaluations showing satisfactory performance in terms of job performance, attendance, and similar measuring factors. If an employee resigned prior to receiving an evaluation, the employee must have successfully completed the 90-day probationary period and have no disciplinary or similar record in the employee's prior employment file;

Rehiring within 30 Days Following the Termination Date

The employee will be deemed hired on the original hire date with no break in service for purposes of determining eligibility for employee benefits and service recognition. Any missed premium deductions will be deducted from the first paycheck upon return.

- **Drug Screen.** Pass a current pre-employment drug screening test.

Rehiring within 91 Days Following the Termination Date

- **Drug Screen.** Pass a current pre-employment drug screening test.
- **Rehire Date.** The employee will be deemed hired on the rehire date for purposes of determining eligibility for service recognition.
- **Compensation.** If the employee is rehired for the same position or a comparable position to the one formerly held; the employee's compensation will be unchanged from the compensation on the termination date. If the employee is hired into a different job at a different site for which the pay level is greater or less than that of the employee's former position, the employee will receive the compensation earned by similarly situated employees in the new position.
- **Insurance and Similar Benefits.** If rehired within 13 weeks of termination date, previous Medical coverage will be restored upon date of rehire, if employee was previously enrolled in one of Galen's Medical plans. All other health benefits and Group Life Insurance will be restored based on the terms of the plans by the first day of the month following the rehire date.
- **Retirement Benefits.** The rehired employee may participate in the Company's retirement program, e.g., 401(k) or similar plan, as soon as is practicable based on the terms of the plan and the rehire date.
- **Accrual of Leave.** The rehired employee will accrue ETO at the same rate as the

employee accrued such leave prior to the termination date. If the employee fills a new position with a higher rate of accrual for any category of leave, the newly rehired employee will accrue such leave at the higher rate. No ETO is accrued during the period between the termination date and the rehire date. *See accrual restoration rules for accrual eligibility date.

***Accrual Restoration Rules for Eligible Employees**

- If a former employee with less than one-year prior service is rehired, the employee will begin accruing ETO after 30 days from rehire date.
- If a former employee with more than one-year prior service is rehired, the employee will begin accruing ETO immediately from rehire date.
- **Past Accrual.** If the employee had accrued but unused leave at the time of termination and the employee was not paid for such leave at the time of termination, the accrued but unused leave will be restored to the employee.

Rehiring within 92 to 180 Days Following the Termination Date

- **Drug Screen.** Pass a current pre-employment drug screening test.
- **Rehire Date.** The employee will be deemed hired on the rehire date for purposes of determining eligibility for employee benefits and service recognition.
- **Compensation.** If the employee is rehired for the same position or a comparable position to the one formerly held; the employee's compensation will be unchanged from the compensation on the termination date. If the employee is hired into a different job at a different site for which the pay level is greater or less than that of the employee's former position, the employee will receive the compensation earned by similarly situated employees in the new position.
- **Insurance and Similar Benefits.** Medical Insurance and Group Life Insurance will be restored based on the terms of the plans by the first day of the month following the rehire date.
- **Retirement Benefits.** The rehired employee may participate in the Company's retirement program, e.g., 401(k) or similar plan, as soon as is practicable based on the terms of the plan and the rehire date.
- **Accrual of Leave.** The rehired employee will accrue ETO at the same rate as the employee accrued such leave prior to the termination date. If the employee fills a new position with a higher rate of accrual for any category of leave, the newly hired employee will accrue such leave at the higher rate. No ETO is accrued during the period between the termination date and the rehire date. *See accrual restoration rules for accrual eligibility date.

***Accrual Restoration Rules for Eligible Employees**

- If a former employee with less than one-year prior service is rehired, the employee will begin accruing after 60 days from rehire date.
- If a former employee with more than one-year service is rehired, the employee will begin accruing ETO immediately from rehire date.
- **Past Accrual.** If the employee had accrued but unused leave at the time of termination and the employee was not paid for such leave at the time of termination, the accrued but unused leave will be restored to the employee.

Rehiring within 181 Days or More Following the Termination Date

Rehiring 181 days or More After Termination

Any employee rehired more than 181 days after the termination date will be treated as a new hire, with regard to compensation, employee benefits, leave, and all other terms and conditions of employment.

- **Drug Screen.** Pass a current pre-employment drug screening test.
- **Background Check.** A new background check will be completed and submitted with an updated application and resume. Report from the background check must be in compliance with Galen's background check policy.

REDUCTION IN STAFFING

Certain budget conditions and/or the efficient operation of Galen may necessitate reductions in staffing or the elimination of positions. Although Galen hopes to avoid layoffs, they cannot always be avoided. We will attempt to provide two weeks' notice of any layoff, although we cannot guarantee any notice. If a layoff of some but not all employees in a position occurs, Galen will typically retain employees and lay off others on the basis of a combination of factors including performance, productivity, attendance, attitude and seniority. If a position or positions are eliminated, ordinarily the person(s) holding the position(s) will be laid off. The decision regarding which employee(s) will be laid off is within the sole discretion of management.

NEPOTISM

It is Galen Medical Group's policy to not employ immediate relatives at the same site unless approved by management and administration personnel. Immediate relatives include spouse, child, siblings, parents, grandparents and the equivalent relatives acquired through marriage. This policy protects the corporation, as well as the employee, from allowing personal matters to interfere with the workplace. Those employees who currently work with immediate relatives will be grandfathered in due to the development of this policy effective May 1, 2001.

The reporting path of employees should never include family members. By completing an employment application, new employees will be questioned about family members who currently work at Galen Medical Group. If there are family members employed, before an offer of employment is made, approval must be given by Human Resources.

JOB DESCRIPTIONS & PERFORMANCE APPRAISALS

It is the policy of Galen Medical Group to endeavor to conduct formal, fair and uniform employee performance appraisals on a periodic basis. Satisfying quality standards of comprehensive patient care is a responsibility of all who are associated with Galen. Fulfilling this responsibility depends entirely upon the performance and support of each employee.

Criteria-based job descriptions are written by the manager and reflect why the position exists, the primary responsibilities and standards, and the basic qualifications for the job.

- A. The main objectives of the Job Description and Performance Appraisal programs are:
1. To provide an objective method to evaluate individual employee performance.
 2. To create a climate in which employees will be motivated to provide a high-quality standard of patient and employee services.
 3. To review the employee's performance as it relates to pre-established standards.
 4. To establish a fair and equitable system which determines the employee's eligibility for salary increases based on the employee's performance and contribution.
 5. To assist employees through guidance and encouragement, and identify development or training needs.
 6. To identify candidates qualified for promotion or other potential positions.
 7. To identify employees whose performance is unsatisfactory.

The following definitions of levels of performance will be used in the assessment of performance for all employees:

Performance Rating Categories and Definitions:	Rating	Definition
Substantially Exceeds Expectations	9-10	Performance which is exceptional. Performance expectations and requirements are consistently and significantly exceeded in all areas of responsibility.
Exceeds Expectations	7-8	Performance which exceeds performance expectations and requirements in some areas of responsibilities and meets expectations and requirements in others.
Meets Expectations	5-6	Performance which meets all expectations and requirements. Standard expectations.
Needs Improvement to Meet Expectations	3-4	Performance which fails to meet expectations, standards and requirements in some area of responsibility or only meets them partially. Corrective action is required.
Fail to Meet Expectations	1-2	Performance which is unacceptable and below acceptable levels. Performance consistently does not meet expectations, standards, and requirements. Immediate corrective action is required.

COMPENSATION

Galen Medical Group pays wages and salaries which appropriately recognize job responsibilities and individual performance and are competitive in the job market in order to attract, retain, reward and motivate employees.

The objectives of the wage and salary program are:

1. To pay wages and salaries that are competitive in order to retain qualified personnel and attract competent applicants.
2. To recognize and reward individual performance in the successful completion of job duties.
3. To comply with all applicable federal and state laws.
4. To maintain appropriate financial privacy while communicating salary, policy and procedure to individuals, without restricting employees' rights to discuss wages, benefits and working conditions.
5. To provide a job evaluation process for determining the relative value of jobs at Galen Medical Group.

PAY FOR PERFORMANCE PROGRAM

Galen Medical Group has established a Pay-for-Performance program to provide each employee an incentive for improving performance. The program is designed to ensure fair compensation for each job compared to other jobs within the group and competitive pay levels when compared with wages of comparable groups and industries in the area.

Each job category has a salary range consisting of a minimum start rate, midpoint and a maximum rate:

1. The minimum of the grade is considered the normal starting rate for the new employee who meets the minimum qualifications for the job.
2. The midpoint of the grade is normally considered as the externally competitive wage level for an employee working at a successful level of performance.
3. The maximum of the grade is considered as the maximum wage paid for a position in that grade. Typically, employees are paid the maximum of the grade if they have exhibited outstanding performance over a period of several years.

The category in which an employee's position is classified is determined by the labor market. The employee's rate of pay within the grade is determined by two factors: experience and job performance. Pay-for-performance guidelines are maintained by the manager and are periodically evaluated by the Human Resources Department for competitiveness.

WORK HOURS

Workday & Work Week

The workday is from 12:00 a.m. to 11:59 p.m., and the work week begins at 12:00 a.m. Thursday and ends at 11:59 p.m. on the following Wednesday.

Regular Work Hours and Meal Periods

Work hours, work schedule and meal periods will be set by the employee's manager.

Tennessee state law requires that any employee who is assigned a work period of more than six (6) hours must take a meal period of at least 30 minutes. The break period cannot be scheduled during the first hour of scheduled work. All employees working over six (6) hours in one working session will be provided an unpaid meal period of 30 minutes, and all non-exempt hourly employees are required to clock out for this period.

Employees are relieved of all duties during their meal period and therefore, the meal period will not be counted as time worked.

TIME REPORTING

For non-exempt hourly employees, it is the responsibility of each employee to use the time clock four times a day when arriving for work or leaving the property, for non-work related purposes such as going to lunch or taking breaks. If a meeting will be taking place over your lunch break that is deemed mandatory, you should stay clocked in and note a lunch meeting on your time report. Time off (holiday, leave without pay, or ETO) must be recorded on your time report as such.

Falsifying records could result in disciplinary action, up to and including termination. Your time report will serve as the documentation of your time worked during the pay period.

If an error occurs with the time clock, the employee is to immediately report to their Practice Manager or Site Supervisor for correction authorization. Employees who have continual problems with failing to be compliant with correctly clocking in and out for time reporting will be subject to disciplinary actions, up to and including termination, for continual failure to appropriately use the time clock.

Exempt salaried employees will be required to complete their time sheet each pay period in the time and attendance system. The timesheet will appropriately list the days worked as well as any earned time off, holidays and/or bereavement time for tracking purposes.

OVERTIME

Occasionally it is necessary to work overtime due to patient care demands, emergencies or increased workload in the department. Employees are expected to cooperate with their manager when asked to work overtime.

All non-exempt hourly employees are covered by the following overtime provision and shall receive one and one-half (1 1/2) times the employee's regular rate of pay for all approved hours worked over forty (40) hours in the week.

All overtime must receive prior approval from your supervisor.

All non-exempt hourly employees who perform two or more jobs during one week, paying different rates of pay, will be compensated time and one-half the established straight-time rate for the work performed during overtime hours.

Time off, including ETO, holidays and bereavement time will not be counted as time worked for overtime purposes.

PAY CHECKS & PAY DAYS

You will be paid on a bi-weekly schedule, every other Wednesday. Paychecks for those not using direct deposit will be available from your supervisor when they are distributed to your Practice Manager. Any problems or questions regarding your paycheck must be addressed with your Practice Manager by 5:00 p.m. on the day that paychecks are distributed. If the payday falls on a holiday, Galen will make every reasonable effort to issue your paycheck to you on the last regular workday preceding the holiday.

HOLIDAYS

Galen observes the following six holidays each year:

1. New Year's Day
2. Memorial Day
3. Independence Day
4. Labor Day
5. Thanksgiving Day
6. Christmas Day

When a holiday falls on Saturday, Galen will normally observe the holiday the preceding Friday; when a holiday falls on a Sunday, Galen will normally observe the holiday the following Monday.

Payment for Holidays

Employees' will receive Holiday pay for an amount equal to their regular scheduled work hours.

Requests for time off during the holidays will be granted on a first come first serve basis dependent upon the office/clinic schedule, the employee's past attendance record as well as the amount of ETO accrual balance of the employee. Employees scheduled to be off the day before or the day after a holiday will be paid the holiday if they are eligible for holiday pay. Employees scheduled to work the day before or the day after a holiday and is absent from work on those days will not be paid for the holiday unless the employee can supply a physician's excuse for illness. It is imperative that employees who are scheduled to work be present for their shift due to the needs of the business in providing quality patient care.

Holidays Worked

If you are a regular full-time, non-exempt hourly employee and work on a Galen observed holiday, you will be paid your regular rate of pay for hours actually worked on the holiday, plus any regular holiday pay for the day.

Part-time employees who work on a holiday will be paid for hours worked on the holiday at their regular rate of pay.

INCLEMENT WEATHER PROGRAM

Galen recognizes the fact that inclement weather and other emergencies can affect the ability to open for business and the employee's ability to get to work. The safety of our employees is paramount in any emergency situation. In the event a Galen site is closed for any portion of a work day due to inclement weather employees will be paid as follows:

- During the time when the site is closed, exempt employees will receive their full salary for their normal hours worked.
- Nonexempt employees will receive their hourly pay for their normally scheduled hours. No overtime will be paid to any employee.

If an employee elects not to report to work on an open day, the employee can elect to (1) use any accrued earned time off (ETO) for the missed day or (2) the employee will not be paid for the day.

Employees are encouraged to stay tuned to local television and radio stations for delays and closing of Galen sites. If a site is open or delayed, all employees are expected to be present for their work shift according to the office hours. It is the employee's responsibility to notify the Practice Manager if they are unable to work their shift.

EARNED TIME OFF

Definition

Galen Medical Group provides its benefit eligible staff with paid time off benefits. This benefit is given in place of vacation, personal and sick pay programs. "Earned Time Off" (ETO) is a combination of such paid benefits into one flexible program.

Eligibility

If you are a regular full-time employee, you begin accruing paid leave time after three months of continuous employment. It will be paid at the employee's pay rate, exclusive of overtime or call pay. Pro-rated full-time employees will accrue earned time off at a pro-rated rate as outlined in the ETO schedule.

Part time employees who have a status change to pro-rated full time or full time status may be eligible to receive ETO prior to the standard three-month waiting period per the following schedule:

- If the status change is within the first 30 days of hire, the employee will begin the 90-day waiting period as of his/her original hire date.
- 30 days through 1 year of employment, the employee will be eligible after a 60-day waiting period.

- 1 year through 3 years of employment, the employee will be eligible after a 30-day waiting period.
- 3 years of employment or more, the employee will be eligible the effective day of the status change to full time employment.

Use of ETO

Request for ETO must be submitted in the time and attendance system in advance to your supervisor except for personal illness or immediate family illness. Every reasonable effort will be made to accommodate the request; however, supervisors are required to consider the company's needs. For this reason, employees may not in every case be allowed to take leave on the requested dates.

All other accrued ETO may be carried forward to a maximum of 480 hours (60 days) to the following calendar year. Hours in excess of the maximum of 480 hours must be used during the following year or will be forfeited.

An employee may donate accrued ETO to a co-worker who has had an extended leave of absence due to illness or hospitalization of employee or employee's dependent(s). Other reasons may be allowed at the discretion of management. The employee must submit the request to their Practice Manager. The employee receiving the ETO must use all of his/her time prior to the donated time being used. Donated ETO hours will be at the donor's rate of pay. If the recipient of the donated ETO were to leave Galen prior to its use, the donated ETO will go back to the donor.

An employee, wishing to take time off without pay, may request the time off in the Paycom system. Approval is at the discretion of the Practice Manager based on the staffing needs of the site.

Non-exempt employees wishing to take time off due to hours worked during the pay week to avoid overtime may not necessarily have to use ETO for the absent hours. The unpaid time off or use of ETO will be at the discretion of management.

- *ETO will begin accruing after 3 months of employment for permanent full-time employees.
- *ETO will not be counted as time worked for overtime calculations.
- *ETO cannot be paid in advance.
- *ETO will be calculated based on employee's paid hours up to 40 hours in a week.

ACCRUAL CHARTS

Regular Full Time Employees

Years of Service	Rate per Hour of Paid Time	Rate / 80 hour Pay Period	Hours per Year	Days per Year
0 – 5 years	0.0615	4.92	128.00	16.00
5 – 10 years	0.0808	6.46	168.00	21.00
10 + years	0.1000	8.00	208.00	26.00

Pro-Rated Full Time Employees

Years of Service	Rate per Hour of Paid Time	Rate / 64 hour Pay Period	Hours per Year	Days per Year
0 – 5 years	0.0615	3.93	102.18	12.77
5 – 10 years	0.0808	5.16	134.16	16.77
10 + years	0.1000	6.40	166.40	20.80

Exempt / Management Employees

Years of Service	Rate per Hour of Paid Time	Rate based on 40 hr week	Hours per Year	Days per Year
0 – 5 years	0.0808	6.46	168.00	21.00
5 – 10 years	0.1000	8.00	208.00	26.00
10 + years	0.1192	9.53	248.00	31.00

Leave time continues to accrue during paid time off, holidays, family medical leave, jury duty time, bereavement time, and military time for reserve duty. ETO will not accrue during personal leave.

Payout of ETO

All employees who terminate (both voluntarily and involuntarily) will receive their unused ETO in their final paycheck at a percentage rate based on length of service. The table for payout is as follows:

Less than 12 months of service	0% vested
12 > 24 months of service	25% vested
24 > 36 months of service	50% vested
36 > 48 months of service	75% vested
48+ months of service	100% vested

Due to this change being effective January 1, 1998, employees hired prior to January 1, 1998 are “grandfathered in” for vesting purposes due to the policy at the time of their employment.

ETO Buy Back Program

As a benefit to our employees Galen offers four opportunities each year (March, June, September & December) for employees to buy back a portion of their unused ETO. Guidelines are as follows:

- Employees must be fully vested, with at least **4 years** of service.
- Employees must leave a **minimum of 40 hours** in their ETO bank, after the transaction of the buy back.
- Employees may buy back a **maximum of 40 hours** (to be paid out at your current rate of pay).

BEREAVEMENT TIME

Galen Medical Group provides paid bereavement leave to assist employees in dealing with the loss of a family member. The following paid days off will be available:

Immediate Family - 3 consecutive work days

Immediate family is defined as spouse, child, step-child, parent, step-parent, grand parent, siblings, and step-siblings

Extended Family - 1 scheduled work day

Extended family is defined as mother & father in-law, son & daughter in-law, grandparent in-law, and sibling in-law.

The intent of this policy is to supplement the employee's personal ETO. With permission from the employee's supervisor, additional unpaid bereavement time may be granted.

JURY DUTY TIME

Galen recognizes your civic obligation to serve as a member of a jury; therefore, time off necessary to serve as a juror will be granted. Once notification is received that the employee will be required to report to jury duty, it is the employee's responsibility to submit a copy of the summons to their Practice Manager as soon as possible and in no event later than the next work day on which the employee is scheduled to work after the employee's receives a jury summons. Employees called for jury duty will receive their usual compensation (in addition to what is paid by the court) for each day of jury duty, including pay for time serving and traveling to and from jury duty. A signed release from the court clerk showing dates and hours of jury service, as well as written verification from the employee of any travel time to and from jury duty, must be provided to your Practice Manager.

Practice employees are excused from work on any day they serve jury duty for more than three hours, the night before the employee's first day of jury duty if they are working a night shift or during hours preceding those in which the court is normally held, and the next scheduled work period within 24 hours of serving more than three hours of jury duty. If an employee serves less than three hours of jury duty on a day on which the employee is scheduled for work, then you must report to work as soon as possible thereafter and provide appropriate documentation of logging of jury duty and travel time to your Practice Manager. In addition, you are requested to keep in touch with your supervisor throughout your jury duty and to assist others in maintaining standard business operations.

MILITARY LEAVE OF ABSENCE

If you are required to participate in any branch of the military service of the United States, either voluntarily or by induction, for five years or less, you shall retain employment status with Galen, provided you make application for re-employment within the required time period upon completion of your period of military service, and you are honorably discharged.

Upon returning from such military service, you shall be assigned, if possible, to your former position at the then prevailing rate of pay for that position, provided you are physically able to qualify for such position.

In addition, any employee who is a member of the military service and is required to participate in this service, the employee may be allowed to use his/her accrued ETO during their absence away from the corporation. Any employee requiring to serve in this capacity is requested to notify their Practice Manager immediately upon notice of such service.

In order to avoid lapsing of your group insurance benefits, be sure to make arrangements with the Human Resources Department prior to your leave of absence to elect Continuing Health Care Coverage under COBRA.

FAMILY AND MEDICAL LEAVE

Galen Medical Group recognizes that employees occasionally need to take time away from work to care for important family and medical needs. This policy is designed to meet those needs in a manner that is beneficial to employees, their families, and to Galen. Family and medical leave is provided in accordance with the federal Family and Medical Leave Act (FMLA), which provides for unpaid, job-protected leave to covered employees in certain circumstances.

Eligibility

To qualify for FMLA leave, you must: (1) have worked for Galen for at least 12 months, although it need not be consecutive; (2) worked at least 1,250 hours in the last 12 months; and (3) be employed at a worksite that has 50 or more employees within 75 miles. If you have any questions about your eligibility for FMLA leave, please contact the Human Resources Department.

FMLA Leave Policy

If eligible, you may take up to 12 or 26 weeks of family or medical leave, whichever is applicable (as explained below), within the relevant 12-month period defined below. While you are on FMLA leave, Galen will maintain your group health insurance coverage at the same level and under the same circumstances as when you were actively working, as explained more fully under the section titled, *Medical and Other Benefits*. Upon returning from approved FMLA leave, you have the right to be restored to the same job or an equivalent position, subject to the terms, limitations, and exceptions provided by law.

FMLA Leave Entitlement

You may take up to 12 weeks of unpaid FMLA leave in a 12-month period, which is measured forward from the date an employee's first FMLA leave begins/uses a "rolling" method that is measured backward from the date you use any FMLA leave for any of the following reasons:

- the birth of a son or daughter and in order to care for that son or daughter (leave to be completed within one year of the child's birth);
- the placement of a son or daughter with you for adoption or foster care and in order to care for the newly placed son or daughter (leave to be completed within one year of the child's placement);
- to care for a spouse, son, daughter, or parent with a serious health condition;

- to care for your own serious health condition, which renders you unable to perform any of the essential functions of your position; or
- a qualifying exigency of a spouse, son, daughter, or parent who is a military member on covered active duty or called to covered active duty status (or has been notified of an impending call or order to covered active duty).

You may take up to 26 weeks of unpaid FMLA leave in a single 12-month period, beginning on the first day that you take FMLA leave to care for a spouse, son, daughter, or next of kin who is a covered service member and who has a serious injury or illness related to active duty service, as defined by the FMLA's regulations (known as military caregiver leave).

Both Spouses Employed by Galen

Spouses who are both employed by Galen and eligible for FMLA leave may be limited to:

- A combined total of 12 weeks of leave during the 12-month period if leave is requested:
- for the birth of a son or daughter and in order to care for that son or daughter;
- for the placement of a son or daughter with the employee for adoption or foster care and in order to care for the newly placed son or daughter; or
- to care for an employee's parent with a serious health condition.
- A combined total of 26 weeks in a single 12-month period if the leave is either for:
- military caregiver leave; or
- a combination of military caregiver leave and leave for other FMLA-qualifying reasons.

Notice of FMLA Leave

If your need for FMLA leave is foreseeable, you must give the Human Resources Department at least 30 days' prior written notice. If this is not possible, you must at least give notice as soon as practicable (within one to two business days of learning of your need for leave). Failure to provide this notice may be grounds for delaying FMLA-protected leave, depending on the particular facts and circumstances.

Additionally, if you are planning a medical treatment or a series of treatments or you are taking military caregiver leave, you must consult with the Human Resources Department first regarding the dates of this treatment to work out a schedule that best suits the needs of the employee or the covered military member, if applicable, and Galen.

Where the need for leave is not foreseeable, you are expected to notify the Human Resources Department within one to two business days of learning of your need for leave, except in extraordinary circumstances. Galen has FMLA request forms available from the Human Resources Department. Please submit a written request, using this form, when requesting leave.

Certification of Need for FMLA Leave

If you are requesting leave because of your own or a covered relative's serious health condition, you and the relevant health care provider must supply appropriate medical certification. You may obtain FMLA Medical Certification forms from the Human Resources Department. When you request leave, the Human Resources Department will notify you of the requirement for medical certification and when it is due (at least 15 days after you request leave). If you provide at least 30 days' notice of medical leave, you should also provide the medical certification before leave begins. Failure to provide requested medical certification in a timely manner may result in denial of FMLA-covered leave until it is provided.

Galen, at its expense, may require an examination by a second health care provider designated by Galen. If the second health care provider's opinion conflicts with the original medical certification, Galen, at its expense, may require a third, mutually agreeable, health care provider to conduct an examination and provide a final and binding opinion. Galen may require subsequent medical recertification. Failure to provide requested certification within 15 days, when practicable, may result in delay of further leave until it is provided.

Galen also reserves the right to require certification from a covered military member's health care provider if you are requesting military caregiver leave and certification in connection with military exigency leave.

Reporting While on FMLA Leave

If you take FMLA leave because of your own serious health condition or to care for a covered relative, you must contact the Human Resources Department and provide regular updates, at least every thirty days, on the status of the condition and your intention to return to work. In addition, you must give notice as soon as practicable (within two business days if feasible) if the dates of leave change or are extended or initially were unknown.

FMLA Leave Is Unpaid

FMLA leave is unpaid. You will be required to substitute any accrued and unused ETO for unpaid FMLA leave as described below:

- If you request leave because of a birth, adoption, or foster care placement of a child, any accrued and unused paid ETO will first be substituted for unpaid family/medical leave and run concurrently with your FMLA leave.
- If you request leave because of your own serious health condition, or to care for a covered relative with a serious health condition, any accrued paid ETO will be substituted for any unpaid family/medical leave and run concurrently with your FMLA leave.

The substitution of paid ETO for unpaid FMLA leave time does not extend the 12 or 26 weeks (whichever is applicable) of the FMLA leave period. In no case can the substitution of paid ETO for unpaid FMLA leave time result in your receipt of more than 100% of your salary. Your FMLA leave runs concurrently with any other types of applicable leave.

Medical and Other Benefits

During approved FMLA leave, Galen will maintain your health benefits as if you continued to be actively employed. If paid leave is substituted for unpaid FMLA leave, Galen will deduct your portion of the health plan premium as a regular payroll deduction. If your leave is unpaid, you must pay your portion of the premium. You may choose from three options:

- One lump sum
- Monthly payment

Checks for such premium payments must be made payable to Galen Medical Group and submitted or mailed to the Human Resources Department.

- Establish a repayment system upon return to work from FMLA leave
 - Payroll deduction for repayment will be in addition to the normal benefit deductions
 - Payment schedule cannot exceed 10 repayments.

Your health care coverage will cease if your premium payment is more than 30 days late. If your payment is more than 15 days late, we will send you a letter to this effect. If we do not receive your premium payment within 15 days after the date of this letter, your coverage may cease. If you elect not to return to work for at least 30 calendar days at the end of the leave period, you will be required to reimburse Galen for the cost of the health benefit premiums paid by Galen for maintaining coverage during your unpaid leave, unless you cannot return to work because of a serious health condition or other circumstances beyond your control.

Exemption for Key Employees

Key employees, defined as salaried and FMLA-eligible employees who are among the highest paid 10% of all employees at a worksite or within 75 miles of that worksite, may not be returned to their former or an equivalent position following FMLA leave if restoration of employment will cause substantial and serious economic injury to the operations of Galen. This fact-specific determination will be made by Galen on a case-by-case basis. Galen will notify you if you qualify as a key employee, if Galen intends to deny reinstatement and of your rights in these instances.

Intermittent and Reduced FMLA Leave Schedule

If medically necessary, FMLA leave occasioned by a serious health condition may be taken intermittently (in separate blocks of time due to a serious health condition) or on a reduced leave schedule (reducing the usual number of hours you work per workweek or workday). FMLA leave may also be taken intermittently or on a reduced leave schedule for a qualifying exigency relating to covered military service.

If leave is unpaid, Galen will reduce your salary based on the amount of time actually worked. In addition, while you are on an intermittent or reduced schedule leave, Galen may temporarily transfer you to an available alternative position that better accommodates your leave schedule and has equivalent pay and benefits.

Returning from FMLA Leave

If you take leave because of your own serious health condition (except if you are taking intermittent leave), you may be required, as are all employees returning from other types of medical leave, to provide medical certification that you are fit to resume work. Otherwise, you may not be permitted to resume work until it is provided.

PERSONAL LEAVE OF ABSENCE

If ineligible for FMLA, Galen may give appropriate consideration to a reasonable request for a leave of absence for personal reasons. Requests may be granted at the discretion of management. Application for and granting of all personal leaves shall be submitted in writing to your Practice Manager and a copy of the approved (or disapproved) leave authorization will be given to you and the Human Resources Department.

Galen also will give appropriate consideration to a reasonable request for an extended medical leave of absence after exhausting the employee's leave rights under the FMLA as a reasonable accommodation for the employee's disability, so long such extended medical leave does not create an undue hardship.

In order to avoid lapsing of your group insurance benefits, you must make arrangements with the Human Resources Department prior to your leave of absence to elect continuing health care coverage under COBRA.

MATERNITY AND PATERNITY LEAVE

Employees who have worked for Galen Medical Group for at least 12 consecutive months may be eligible for unpaid maternity or paternity care leave. Qualifying employees may take up to four months off for the adoption of a child, pregnancy, childbirth, and nursing an infant in a 12-month period.

To request leave under this policy, you should give at least three months advance notice of:

- the anticipated date your leave period will begin. For adoption, leave begins on the date you take custody of the child;
- the length of leave; and
- your intention to return to full-time employment after leave ends.

On your return from leave, you will be restored to the same or a similar position without loss of accrued benefits.

Any leave under this policy that also qualifies as FMLA leave will be counted against your leave entitlement under both policies. You must comply with the requirements of both policies. However, if you wish to take only 12 work weeks of leave (or the amount remaining at the time) afforded under the FMLA policy, you will only be required to follow the notice requirements of the FMLA policy.

If you are on a maternity or paternity leave that also qualifies as FMLA leave, you will receive the rights, privileges, compensation, and benefits provided under the FMLA policy. If any portion of your leave does not qualify as FMLA leave, you will receive the same rights, privileges, compensation, and benefits as any employee on non-FMLA leave.

The purpose of this leave is to provide time to employees for adoption, pregnancy, childbirth and nursing the infant, where applicable; therefore, if Galen Medical Group finds that the employee has utilized the period of leave to actively pursue other employment opportunities or if Galen Medical Group finds that the employee has worked part time or full time for another employer during the period of leave, then Galen Medical Group shall not be liable under this section for failure to reinstate the employee at the end of the leave.

NURSING MOTHERS BREAKS

Employees who need to express breast milk for their infant children will be provided reasonable unpaid break time each day, unless providing that break time would unduly disrupt Galen Medical Group's business operations. If possible, this break time will run concurrently with any break time already provided. Galen will make reasonable efforts to provide a room or other location other than a toilet stall that is close to the work area for you to express breast milk in private.

VOLUNTEER FIREFIGHTERS LEAVE

Employees who are active volunteer firefighters may leave work to respond to fire calls during their regular hours of employment. Galen Medical Group may charge time spent on an emergency response against an employee's regular pay.

If you leave work to respond to a fire call, you may be permitted to take off the next scheduled work period within 12 hours after that response as an annual leave or sick leave day without loss of pay if you assisted in fighting the fire for more than four hours. If you are not entitled to an annual leave or sick leave day, you may be permitted to take unpaid leave. You are entitled to the same leave if you are an active volunteer firefighter and you worked for more than four hours as a volunteer firefighter in an emergency in the last day.

Galen may require you to submit a written statement from the chief of the volunteer fire department:

- verifying that you responded to a fire or were on-call; and
- specifying the date, time, and duration of the emergency fire response.

VOTING LEAVE

Employees are encouraged to vote in elections and may take up to three hours off from work, with pay, to vote. Galen Medical Group may determine which hours you may take off to vote. You will not be entitled to paid time off to vote if your work schedule begins three hours or more after the polls are open or ends three hours or more before the polls close. You must notify your supervisor by noon the day before the election if you wish to take time off to vote.

EMPLOYEE BENEFITS

Group Insurance Benefits

Each regular and pro-rated full-time employee is eligible for Galen group insurance benefits at the first of the month following thirty (30) days. An overview of the benefits will be provided in your initial paperwork by Human Resources. If you have any questions regarding group insurance benefits, please contact the Human Resources Department. Rates for pro-rated and full-time employees are the same and are subject to change for group insurance benefits; please check with the Human Resources Department for correct amounts. It is the employee's responsibility to ensure that appropriate paperwork is completed and submitted to the Human Resources Department PRIOR to the completion of thirty (30) days or benefits will be denied until the next open enrollment date.

Qualifying Events

A qualifying event allows an employee to have a special enrollment period outside of the annual open enrollment period when he/she can sign up for or change his/her benefits. The special enrollment period is 30 days from the qualifying event. What constitutes a qualifying event:

- Losing/gaining other health insurance coverage (documentation required)
- Getting married or divorced (copy of marriage license or divorce decree required)
- Giving birth, legal adoption, or placement of a child (copy of child's SS card required)
- Dependent reaching age 26
- Spousal job change with loss/gain of health coverage (documentation required)

Disability Insurance Benefits

Each regular and pro-rated full-time employee is eligible for Galen group disability benefits at the first of the month following thirty (30) days. An overview of the benefits will be provided in your initial paperwork by Human Resources. If you have any questions regarding disability insurance benefits, please contact the Human Resources Department.

Life Insurance Benefits

Each regular full-time employee is eligible for Galen group life benefits at the first of the month following thirty (30) days. An overview of the benefits will be provided in your initial paperwork by Human Resources. If you have any questions regarding life insurance benefits, please contact the Human Resources Department.

401(K) Employee Retirement Savings Plan

An employee is eligible for Galen's 401(k) Employee Retirement Savings Plan after reaching the age of 21, one year of service and 1000 worked hours in a calendar year with Galen Medical Group. An overview of the benefits will be provided in your paperwork by Human Resources once you become eligible. Of note, per Galen's contract, 2% of your pay will be contributed to your 401K your first year of eligibility. The percentage increases by 1% each calendar year. It is the employee's responsibility to decline the automatic percentage increase if so desired. If you have any questions regarding the 401(k) Employee Retirement Savings Plan, please contact the Human Resources Department.

Worker's Compensation Insurance and Leave

Employees who are injured on the job in a work-related accident are covered under Galen Medical Group's workers' compensation insurance policy, which will pay for treatment and give employees supplemental income if they are away from work for a period of time.

If you are injured on the job in a work-related accident, you must contact the Human Resources Department as soon as possible to complete a Tennessee Department of Labor and Workforce Development Employer's First Report of Work Injury or Illness which will be turned in to Galen's workers' compensation insurance carrier. Failure to report an injury may result in denial of the claim or delay in the determination of coverage. Unless physically unable due to the injury, a urine drug screen should be obtained within two hours of the incident/injury.

If you will have to be off from work due to the injury, you should contact the Human Resources Department to make arrangements for the report to be filled out. You must also complete an incident report for all on-the-job or work-related incidents that result in employee injury, property damage, or qualify as a near miss.

Galen will require you to undergo a Fitness for Duty Examination before returning to work following an injury that resulted in lost work time.

Galen will compensate you for any lost work hours on the date of the accident or injury and for the remaining hours of the day of scheduled work for all work-related accidents or injuries.

If you are off from work due to injury and are receiving workers' compensation benefits, you must continue to pay your portion of the insurance premiums that Galen deducts from your paychecks. Galen will suspend the payment of bankruptcy or child support payments on your behalf unless you make arrangements to reimburse Galen for these payments.

Unemployment Insurance

If your employment terminates, you may be eligible to receive unemployment insurance. In most cases, you must file a claim in order to collect this benefit.

Eligibility requirements for these benefits are set by the State of Tennessee. If you have any questions about unemployment insurance, please contact the Tennessee Department of Labor and Workforce Development.

Social Security

As an employee of Galen, you are covered under the provisions of the Federal Insurance Contributions Act (FICA). Social Security benefits are a step toward providing you and your family a retirement income. The amount of deduction from your wages for Social Security taxes is matched by Galen. The total contribution by you and Galen is credited toward your Social Security benefits, which may be available at the time you are eligible to retire. In addition, disability and survivors' benefits are financed through Social Security deductions.

GALEN'S IMAGE

Standards of Dress & Appearance

Image is a promise of delivery. A positive professional image creates a favorable impression with our customers. They have confidence that we can deliver what is promised - high standards of excellence in healthcare services.

The mission & philosophy of Galen is closely held and widely shared by employees. Every person is expected to participate with pride by looking his/her best. Standards have been established to advise employees on the expectations of Galen's image. These general guidelines are readily adaptable to each employee's personal taste and selection of clothes.

The Practice Manager is responsible for determining what clothing and appearance is appropriate for meeting the standards of Galen's Image. Questions about Galen's image, as well as specific departmental guidelines, should be directed to the Practice Manager.

In addition to practicing good personal hygiene and grooming, the following general guidelines are observed throughout Galen Medical Group:

- A. Clothing: Work clothes should be selected in accordance with Galen's image. Each employee shall wear clothing that is clean, neat and pressed.
 - 1. Pant length must range from mid-calf to ankle-length consisting of a businesslike, loose-fitting material.
 - 2. Shirts must be long enough to tuck in and cover the shoulders. No mid-riff shirts or tank tops.
 - 3. Skirts and dresses should be a conservative length that ranges from the top of the knee to the ankle. Material must be businesslike and loose-fitting.
 - 4. Employees are expected to wear undergarments which must not show through outer clothing.
 - 5. Where uniforms are required the manager will determine the approved style and color.

B. Identification Badges

Each employee is issued a name badge upon employment which must be worn while on duty. The badge should be kept clean and displayed in a readable position during work hours.

- 1. A replacement badge will be issued when an employee's job title or name changes, or in the event that the original badge is damaged. Lost name badges should be reported to your manager immediately and a replacement will be given.
- 2. The badge remains the property of Galen Medical Group and must be returned in the event of termination.

C. Cosmetics, colognes, after-shave and deodorant

Employees may apply cosmetics and/or perfumes moderately. In consideration of all of Galen's customers the use of heavy fragrances is discouraged. All employees are expected to use deodorant or an antiperspirant daily.

D. Hair, mustaches, beards and sideburns

Hair styles shall be conservative, neatly combed or arranged and clean.

1. All employees:
 - a. Body hair should not be visible under clothing.
 - b. Extreme grooming practices, such as shaving the eyebrows, unnatural dying or bleaching of hair or "mohawks" are not consistent with Galen's image and are not permitted.
 - c. Hair accessories are to be conservative and professional.
 - d. Employees may dye their hair a natural color, however extreme colors and designs are not permitted.
 - e. Hair should be kept to a professional length or pulled away from the employee's face allowing it to not interfere with patient care.
 - f. Male employees with facial hair must maintain a neatly trimmed beard, mustache or sideburns.
 - g. Staff in the Endoscopy Suite must wear hair up and away from the face if longer than shoulder length.

E. Hats and sunglasses

Hats or sunglasses are not professional and should not be worn during working hours.

F. Fingernails

Fingernails should be kept clean and presentable. Fingernail length should be conservative and professional. It is recommended that nail length is kept to minimum to help reduce the risk of spreading infections.

Fingernail polish in a conservative and professional color may be worn.

G. Footwear

Shoes must be worn by all employees while on duty and are to be clean, in good condition. For safety reasons sandals and shoes made of canvas material are discouraged in patient care areas. Closed-toed shoes must be worn by employees moving heavy medical or other equipment. Personal protective equipment,

including protective shoe covers, must be worn by those employees exposed to blood or other bodily fluids.

H. Jewelry

Jewelry should be conservative and coordinated with the employee's clothing. Body piercing must not be visible while on duty. No facial piercings are permitted with the exception of ears and nose. Nose jewelry must be no larger than 1mm in size. No bars or gauges are permitted. Each site reserves the right to be more conservative. Patient care area employees should be mindful of wearing excessive jewelry as it can interfere with patient care procedures.

I. Tattoos

Visible tattoos must be small and tasteful as determined by management. No facial tattoos are permitted. Each site reserves the right to be more conservative.

J. Special Observances

Galen may, in its sole discretion, authorize employees to participate in casual day or other attire in conjunction with community-observed holidays or special occasions or events.

K. Exceptions

Any reasonable requests for medical, religious or other accommodations or exceptions to Galen's image guidelines should be directed to Human Resources for appropriate consideration.

L. Uniform Allowance

Some employees may be required to wear uniforms or other specialized and protective clothing. As an added benefit Galen offers a uniform allowance specific to the requirements of each site.

Additional information on the uniform allowance program can be obtained from your Practice Manager.

ATTENDANCE

Galen Medical Group has established attendance standards to ensure work assignments can be effectively performed. Unscheduled absences create hardship, require staffing changes, disrupt important operations, and must be avoided by employees whenever possible.

Galen requires regular and punctual attendance from all employees. Employees who are going to be absent for a full or partial workday or late for work must notify their

manager as far in advance as possible and must follow departmental policy for requesting time off, including written requests. The manager is solely responsible for scheduling and approving time off, as well as approving ETO for unscheduled absences.

The employee is required to personally contact the manager or supervisor to report an unscheduled absence prior to the beginning of his/her scheduled shift. Friends or family members are not authorized to report an absence, unless the employee is physically unable to do so.

Absences will be considered excused if the employee requested the time off in accordance with Galen's policies on ETO, received the required approval for the absence, and has sufficient accrued, but unused, time to cover the absence. Absences also will be considered excused if the employee requested the time off in accordance with Galen's policies permitting a leave of absence, received the required approval for the leave, and is in compliance with the leave policy.

An employee will be considered to have taken an unexcused absence if the employee is absent from work during scheduled work hours without permission, including full-or partial-day absences, late arrivals, and early departures. Any employee who is absent for three or more consecutive days due to illness must provide a note from his physician to verify the employee's need for sick leave and, when requested, fitness to return to work.

Repeated unexcused absences will result in disciplinary action. Discipline may include counseling, oral or written warnings, suspensions, or termination of employment, at Galen's discretion. With the exception of unusual circumstances, any employee who is absent from work for three days without notifying Galen will be deemed to have voluntarily abandoned his or her job, and the employee's employment will be terminated.

PUNCTUALITY

Galen Medical Group has established punctuality standards to ensure that work assignments are performed in a timely manner. Each employee is expected to report on time for his/her scheduled shift.

Guidelines for tardiness:

- A. Tardiness is recorded when an employee does not punch in and/or report for duty by the beginning of his/her scheduled shift.
- B. The employee is required to personally contact the manager or supervisor as soon as possible to report tardiness so that temporary staffing adjustments can be made.
- C. Repeated tardiness will result in disciplinary action. Discipline may include counseling, oral or written warnings, suspensions, or termination of employment, in Galen's discretion.

CONFIDENTIALITY

The removal or copying of any confidential documents or records of Galen or of its patients or clients, including confidential financial data or other non-public proprietary information, will result in immediate disciplinary action, up to and including termination of employment. Galen will defend and take to the utmost extreme of the law. Employees will be required to sign a Confidentiality Statement with the initial employment paperwork and as requested by management.

Personnel files and financial data maintained by Galen are considered confidential and may only be accessed by Human Resources or other authorized Galen managers. Employees may not disclose information obtained through unauthorized access to or use of personnel files and financial data.

This policy is not intended to preclude or dissuade employees from engaging in activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits, or terms and conditions of employment.

TELEPHONES

Company telephones are generally intended for business purposes during working hours. We recognize that employees might occasionally need to use company telephones, as well as their own personal mobile telephones, for personal calls or communications. But any personal calls or communications should be kept to a minimum during working hours, should generally be limited to use during lunch or rest breaks, should not include any unprofessional or inappropriate communications, and should not interfere with your employment responsibilities or productivity. All personal mobile telephones should be placed on vibrate, turned off, and not on your person during working hours.

If an employee is driving a company vehicle, or is driving a personal automobile on company business, the employee should not use in any way a mobile telephone. Full attention should be given to the operation of the vehicle. All telephone calls, text messages or other use of telephone for communicating should only be made when the vehicle is at a complete stop in a safe area.

Employees who violate this policy are subject to discipline, up to and including termination of employment.

ELECTRONIC DEVICES AND PROGRAMS

Electronic devices and downloaded programs can potentially receive, store, and transmit information. Galen must protect the privacy and confidentiality of personal health information that can potentially be intercepted through the use of certain devices or programs. Galen must ensure all electronic devices and programs installed in clinical

settings have safeguards in place to protect the privacy and confidentiality of personal health information.

Galen Medical Group will implement reasonable appropriate measures designed to ensure that electronic devices and programs will be installed, located, and used in a way that minimizes the unauthorized or incidental disclosure of PHI.

A. Installation and Configuration

- a. All electronic devices and program with the potential to receive PHI in any manner must be reviewed and approved by IT before installation.
- b. Galen will only acquire devices or install programs with potential access to PHI that are HIPAA compliant with the appropriate safeguards as required by the HIPAA Privacy and Security Rules.

B. Security of Voice Recognition Devices

- a. Voice recognition on mobile and/or other electronic devices must be disabled when in the clinical setting unless Galen has a business associate agreement with the company providing the voice recognition device.
- b. The PHI transmitted on the device must be encrypted on all clinical approved voice recognition devices.

Failure to comply with this policy may result in disciplinary action up to and including termination.

SOLICITATIONS AND DISTRIBUTIONS

The following definitions of solicitation and distribution apply in this policy:

- A. **Solicitation** includes, but is not limited to, requests for signature, contributions for charities, support of political or organizational activities, and merchandise purchases.
- B. **Distribution** includes, but is not limited to, distribution of literature, pamphlets, leaflets, handbills, notices, or printed matter of any kind.

Use of Galen stationary, supplies or equipment in preparing or communicating solicitations or effecting distributions is prohibited.

Solicitation by an employee during his or her work time (this restriction does not apply during break periods or meal periods) is not permitted.

Solicitations by an employee not on work time (e. g. employee's meal or rest period) of another employee who is on work time, or in such a manner as to interfere with others who are supposed to be working, is also prohibited.

Solicitation by non-employees is prohibited on Galen premises. Distribution of advertising materials, handbills, and literature of any kind in work areas at any time is not permitted.

Any requests from outside persons or organizations to sell merchandise, solicit contributions, distribute literature, arrange displays or utilize Galen's facilities are to be referred to the Practice Manager.

Any questions or requests for authorizations or exceptions should be referred to the Practice Manager.

Employees who fail to observe this policy will be subject to disciplinary action, up to and including termination.

The sole exception to this policy are for permitting a limited number of solicitations and distributions related to charitable activities approved and coordinated by Galen Medical Group.

This policy imposing lawful restrictions on employee solicitations during working time and on distribution of written materials during working time and in working areas is not intended to restrict communications or activities protected or required by federal or state law, including employees' discussing wages, benefits or terms and conditions of employment.

ANTI-HARASSMENT POLICY

Galen Medical strictly prohibits and does not tolerate unlawful harassment against employees or any other covered persons because of race, color, religion, creed, national origin, (physical, mental or visual) disability, age (forty years or older), veteran or military status, genetic information, sex or gender (including pregnancy, sexual orientation or gender identity), or any other characteristic protected under applicable federal, state or local law.

Sexual Harassment

All Galen employees, other workers, and representatives (including vendors, patients, clients and visitors) are prohibited from harassing employees and other covered persons based on that individual's sex or gender (including pregnancy, sexual orientation or gender identity) and regardless of the harasser's sex or gender.

Sexual harassment means any harassment based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any of the following is true:

- Submission to the advance, request, or conduct is made either explicitly or implicitly a term or condition of employment.
- Submission to or rejection of the advance, request, or conduct is used as a basis for employment decisions.
- Such advances, requests, or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile, or offensive work environment.

Galen will not tolerate any form of sexual harassment, regardless of whether it is:

- Verbal (for example, epithets, derogatory statements, slurs, sexually-related comments or jokes, unwelcome sexual advances, or requests for sexual favors).
- Physical (for example, assault or inappropriate physical contact).
- Visual (for example, displaying sexually suggestive posters cartoons or drawings, sending inappropriate adult-themed gifts, leering, or making sexual gestures).
- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

This list is illustrative only, and not exhaustive. No form of sexual harassment will be tolerated.

Harassment is prohibited both at the workplace and at employer-sponsored events.

Other Types of Harassment

Galen's anti-harassment policy applies equally to harassment based on an employee's race, color, religion, creed, national origin, (physical, mental or visual) disability, age (forty years or older), veteran or military status, genetic information, or any other characteristic protected under applicable federal, state or local law.

Such harassment often takes a similar form to sexual harassment and includes harassment that is:

- Verbal (for example, epithets, derogatory statements, slurs, derogatory comments, or jokes).
- Physical (for example, assault or inappropriate physical contact).
- Visual (for example, displaying derogatory posters, cartoons, drawings, or making derogatory gestures).
- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

This list is illustrative only, and not exhaustive. No form of harassment will be tolerated. Harassment is prohibited both at the workplace and at employer-sponsored events.

Complaint Procedure

If you are subjected to any conduct that you believe violates this policy or witness any such conduct, you must promptly speak to, write, or otherwise contact your direct supervisor or Practice Manager (who in turn will report such conduct to the Human Resources Manager). If for any reason you are not comfortable reporting such conduct to your direct supervisor or Practice Manager, you may report directly to the Human Resources Manager. Likewise, if for any reason you also are not comfortable reporting such conduct directly to the Human Resources Manager, then you may report directly to any member of the Management Committee. The Human Resources Manager will ensure that an appropriate investigation is conducted.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. The Human Resources Manager or designee will directly and thoroughly investigate the facts and circumstances of all claims of perceived harassment and will take prompt corrective action, if appropriate. All investigation findings and recommended actions will be reported to the Management Committee, as well as to the accused and accuser. If not satisfied with the recommended action, either the accused or accuser may request to meet with the Management Committee or its designee.

Additionally, any manager or supervisor who observes harassing conduct must report the conduct to the Human Resources Manager (or to any member of the Management Committee if for any reason you are uncomfortable reporting directly to the Human Resources Manager), so that an investigation can be made and corrective action taken, if appropriate.

No Retaliation

No one will be subject to, and Galen prohibits, any form of discipline, reprisal, intimidation, or retaliation for good-faith reporting of incidents of harassment of any kind, pursuing any harassment claim, or cooperating in related investigations. For more information on Galen's policy prohibiting retaliation, please contact the Human Resources Manager.

Galen is committed to enforcing this policy against all forms of harassment. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately. If employees do not report harassing conduct, Galen may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

Violation of this Policy

Any employee, regardless of position or title, who violates this policy, will be subject to discipline, up to and including termination of employment.

SECURITY OF PROPERTY

Galen Medical Group has established a security program to provide reasonable safeguards for employees, property and guests. A policy regarding the program is provided here in detail to avoid any misunderstanding by an employee regarding his or her expectation of privacy while employed at Galen.

- A. Galen property may be removed from the premises only with prior authorization from the employee's manager.
- B. As a part of the security program Galen reserves the right to inspect bundles and/or packages being carried to or from the premises. For this reason the practice of bringing bundles or packages is discouraged.
- C. As a part of the security program Galen reserves the right to conduct a confidential inspection of an employee's personal effects and belongings. This may include, but is not limited to, lockers, closets, desks, equipment, clothing, purses, and other areas where employees would normally have a reasonable expectation of privacy. Because of this policy, employees should not have any expectation of privacy.
- D. The employee's acknowledgment of the right of Galen to conduct security inspections is a condition of employment. Employees who refuse inspection will be subject to disciplinary action up to and including termination of employment. The employee's signature on the receipt for the handbook constitutes his/her acknowledgment of this policy and his/her consent to inspections.
- E. An employee will be supplied keys when needed in the performance of his/her duties. The employee is to safeguard keys and keep them in his/her possession. Missing keys are to be reported to the manager immediately.
- F. Employees should not bring items that may be considered hazardous into the work area.
- G. The possession on Galen premises of illegal drugs, alcohol, illegal firearms or explosive agents is prohibited and will result in disciplinary action up to and including termination.

COMPUTER TECHNOLOGY GUIDELINES AND USE

Galen Medical Group will provide access to or use of its computer technology or equipment to those employees who require such technology or equipment in order to perform their job duties. Such computer technology access includes, but is not limited to, computer usage, internet and e-mail access, telephone and voice mail usage, and fax machine usage.

Employees accessing or using Galen's computer technology or equipment are representing the company. Any employee who accesses or uses Galen's computer technology or equipment must comply with the following guidelines at all times:

1. All communications through Galen's technology or equipment should be used for business and professional reasons.
2. Each employee accessing or using Galen's computer technology or equipment is responsible for doing so in a lawful and ethical manner.
3. Each employee is responsible for the content of all text, audio or images that the employee places or sends through Galen's computer technology or equipment.
4. Fraudulent, obscene, discriminatory, offensive or harassing messages, images or other communications are strictly prohibited.
5. No employee shall access "chat rooms" using Galen's computer technology or equipment.
6. No employee should access pornographic, sexually explicit or "hate" sites on the internet (including social media) through Galen's computer technology or equipment.
7. No employee may download or install any software or shareware to their hard drive that is not expressly authorized or approved by Galen's IT manager.
8. Avoid opening unsolicited messages or internet links, and report any suspicious messages to Galen's IT administrator.

Employees who fail to follow these guidelines or otherwise violate any provision of this policy are subject to discipline, up to and including termination of employment.

All computer technology and equipment provided by Galen remain the property of the company at all times. In addition, all communications, files, data, or other electronic information created, sent or retrieved through Galen's computer technology or equipment, including internet communications, are solely the property of the company, and employees have no rights to privacy therein. Galen, therefore, reserves the right to access, intercept or monitor all such communications, files, data or other electronic information as it deems necessary and appropriate in its discretion. For further clarification, please to the HIPAA Security Policies.

OUTSIDE EMPLOYMENT

Galen discourages outside employment for regular full-time employees. If there are no conflicts of interest involved and the outside employment will have no adverse effect on performance of your job for Galen, then you may engage in outside employment during times other than your regularly scheduled working hours.

Galen requests that you discuss any prospective outside employment with your Practice Manager. If your outside employment does present a conflict of interest or adversely affects your job performance, you may be subject to disciplinary action, up to and including termination.

PHARMACEUTICAL SAMPLE POLICY

Galen Medical Group will not allow the distribution of pharmaceutical samples without a valid written or verbal prescription. Patients, employees and immediate family of employees may receive pharmaceutical samples only if a valid prescription is provided. Within the Galen offices, the physician may verbally prescribe such medication, which may be distributed, to the recipient either by the physician or his or her clinical assistant.

Under no circumstances will pharmaceutical samples be distributed without verification of the prescribing of that drug to the recipient. Employees of Galen Medical Group are prohibited from self-prescribing and from the unauthorized distribution of pharmaceutical samples.

MEDICAL CARE BY GALEN PHYSICIANS

Galen Medical Group has many physicians, providers of services and types of service to offer our patients. Patients of ours may also be employees in our corporation, and we welcome you to use our facilities for you and your family's healthcare needs. As a reminder, if you are under the care of one of our providers, please respect his or her time by not taking advantage of your working relationship to stop them to ask questions regarding your care outside of an office visit or scheduled time. We encourage all Galen employees to utilize our excellent physicians and providers of service; however, to interrupt their daily schedule for "unscheduled" consultations is unfair to their regularly scheduled patients. If you need medical assistance, please check with nursing triage or an appointment scheduler in order to set up a time with a provider.

DRUG & ALCOHOL FREE WORKPLACE

PURPOSE:

Galen Medical Group, P.C. ("Galen") is committed to providing a safe work environment and to fostering the well-being and health of its employees. That commitment is jeopardized when any Galen employee illegally uses drugs on or off the job, comes to work under their influence, possesses, distributes or sells drugs in the workplace, or abuses alcohol on the job. Therefore, Galen has established the following policy, pursuant to T.C.A. Section 50-9-100 *et seq.*:

Definitions:

Healthcare practitioner means any person required to be licensed, permitted, certified, or authorized:

- A. by a board or committee under the division of health-related boards who has humans for patients.
- B. Drug and alcohol abuse counselors
- C. Emergency medical services

POLICY:

- A. It is a violation of Galen policy for any employee to use, possess, sell, trade, offer for sale, or offer to buy illegal drugs or otherwise engage in the illegal use of drugs on or off the job.
- B. It is a violation of Galen policy for any employee to report to work under the influence of, or while having illegal drugs in any detectable amount in his or her body, blood or urine.
- C. It is a violation of Galen policy for any employee to report to work under the influence of or impaired by alcohol.
- D. It is a violation of Galen policy for any employee to use prescription drugs illegally, i.e., to use prescription drugs that have not been legally obtained or in a manner or for a purpose other than as prescribed. Nothing in this policy precludes the appropriate use of legally prescribed medications.
- E. Violations of this policy are subject to disciplinary action up to and including termination, and potential suspension of license by governing boards pending investigation. It is the responsibility of Galen supervisors to counsel employees whenever they see changes in performance or behavior that suggest an employee has a drug problem. Although it is not the supervisor's responsibility to diagnose personal problems, the supervisor should encourage such employees to seek help and advise them about available resources for getting help. Every employee shares responsibility for maintaining a safe work environment, and co-workers should encourage anyone who has a drug problem to seek help.

The goal of this policy is to balance our respect for individuals with the need to maintain a safe, productive and drug free environment. The intent of this policy is to offer a help to those who need it, while still supporting the policy standard that illegal use of drugs and the abuse of alcohol are incompatible with employment at Galen.

Galen offers resource information on various means of employee assistance in our community, including but not limited to drug and alcohol abuse programs. Employees are encouraged to use this resource file, which is located on the employee portal. In addition, from time to time Galen will distribute this information to employees for their confidential use.

PROCEDURE:

Any employee reporting to work visibly impaired may be deemed unable to perform required duties and will not be allowed to work. If reasonably possible, the employee's supervisor will first contact Human Resources to confirm the employee's status. Human Resources will consult privately with the employee to determine the cause of the observation, including whether substance abuse has occurred. If the employee is deemed impaired, the employee will be taken to a partnered drug screening vendor. A drug or alcohol test will be ordered and performed to determine the results. The employee will be suspended from work while awaiting the results. Should an employee refuse to consent to a drug screen, the employee will be terminated immediately and reported to the employee's licensing or certifying board, if applicable. An impaired employee will not be allowed to drive. A phone call will be made to the emergency contact on file with Human Resources or whomever the employee would like us to call. An employee may not be physically restrained, but police should be called if the employee attempts to drive in an impaired condition.

Opportunity to Contest or Explain Test Results

Employees and job applicants who have a positive confirmed drug or alcohol test result will be referred to an outside Medical Review Officer and may offer a list of prescriptions medications. The Medical Review Officer will contact Galen Medical Group to determine ongoing status as an employee.

Healthcare Practitioner Results

- A. A violation of the practitioner's professional licensure occurs when:
 - 1. The health care practitioner refuses to submit to a drug test ordered by Galen; or
 - 2. Tests positive for any drug on any preemployment or Galen-ordered confirmed drug test for Galen when using the drug.
- B. Galen is required to report the positive test or refusal to submit to the drug test to the healthcare practitioner's licensing board. Galen is NOT required to make a report if either:
 - 1. The practitioner produces a lawful prescription for the drug or a valid medical reason for using the drug to the Medical Review Officer within three (3) business days of notification of the test result; or
 - 2. The practitioner reports to the substance abuse peer assistance or treatment program of the appropriate board for the practitioner within three (3) business days of notification of the test result. (See appendixes)
 - i. The practitioner must obtain and maintain the advocacy of the substance abuse peer assistance or treatment program, meaning they must comply with the terms and conditions of the program in order for Galen to reinstate their employment.

Confidentiality

The confidentiality of any information received by the employer through a substance abuse testing program shall be maintained, except as otherwise provided by law.

Job Applicant Drug Testing

All job applicants at Galen must submit to testing for substance abuse as a condition of employment. Any applicant with a confirmed positive test result may be asked to submit to a random screening test over a period of time or denied employment. Applicants will not be considered for hire for a one-year period after a positive test result.

Applicants will be required to submit voluntarily to a urinalysis (or other appropriate) test at a laboratory chosen by Galen. As a condition of employment each applicant must sign a consent agreement which will release Galen from liability for inaccurate or false test results. If the physician, official or lab personnel have reasonable suspicion to believe that the job-applicant has tampered with the specimen, the applicant will not be considered for employment.

Galen will not discriminate against applicants for employment because of a prior history of drug or alcohol abuse, but may consider related criminal convictions. The primary purpose of this policy is upon the current illegal use of drugs and/or abuse of alcohol that prevents employees from performing their jobs properly.

Employee Drug Testing

Galen has adopted testing practices, and may modify those practices from time to time, to identify employees who illegally use drugs on or off the job or who abuse alcohol on the job. As a condition of continuing employment for all employees, every employee must submit to substance abuse testing under the following circumstances:

- A. When employees have caused or contributed to an on-the-job injury
- B. As part of a follow-up program to treatment for drug abuse;
- C. Routine fitness-for-duty drug or alcohol testing. A covered employer must require an employee to submit to a drug or alcohol test if the test is conducted as part of a routinely scheduled employee fitness-for-duty medical examination where the examinations are required by; law, regulation, are part of the covered employer's established policy, or one that is scheduled routinely for all members of an employment classification group.
- D. Upon any reasonable suspicion to believe that the employee is illegally using drugs or abusing alcohol.
- E. Random drug testing at Galen's discretion.

Employees may be selected at random for drug testing at any time. These tests are unannounced and should be expected by employees at any time. Employees will be given notice to report for random drug testing at a specified laboratory by the end of the day the notice is provided. If an employee test positive, the employee will be suspended immediately without pay and will be referred to the EAP or substance abuse peer assistance or treatment program of the applicable board for the employee practitioner for treatment at the employee's cost. Upon successful completion of the treatment program, employee's job will be reinstated.

Testing will be performed monthly thereafter. If employee test positive a second time, employee will be terminated with no eligibility for rehire. Reporting for healthcare practitioners to licensing boards should be followed as stated above in "Opportunity to Contest or Explain Test Results"

"Reasonable suspicion" is based on a belief that an employee is using or has used drugs or alcohol in violation of this policy, drawn from specific, objective, facts and observations, and reasonable inferences drawn from those facts and observations. Among other things, such facts, observations and inferences might include, but not limited to:

- A. Observable phenomena while at work such as direct observation of substance abuse or common physical symptoms or manifestations of being impaired due to substance abuse;
- B. Abnormal conduct or erratic behavior while at work, or a significant deterioration in work performance; A report of substance abuse provided by a reliable and credible source;

- C. Evidence that an individual has tampered with any substance abuse test during his or her employment with Galen;
- D. Information that an employee has caused or contributed to an accident while at work; or evidence that an employee has used, possessed, sold, solicited, or transferred drugs while working, while on the employer's premises, or while operating any vehicle, machinery, or equipment at any time before, during, or after work hours.

Alcohol Testing

The consumption or possession of alcoholic beverages on Galen premises is prohibited. (Galen sponsored activities, which may include the serving of alcoholic beverages, are not included in this provision.) An employee whose normal faculties are impaired due to alcoholic beverages, or whose blood alcohol level tests .08% by weight for non-safety sensitive positions, or .04% for safety sensitive positions, while on duty or Galen business shall be guilty of misconduct, and shall be subject to discipline up to and including termination.

Refusal to Submit

Failure to submit to a required substance abuse test or comply with EAP referral is misconduct and shall be subject to discipline up to and including termination, and reported to the employee's licensing or certifying board if applicable.

Substance abuse testing for job applicants and employees may include a urinalysis screen for the following drugs: *

Alcohol: (not required for job applicant testing) Any "Alcoholic Beverage", all liquid medications containing ethyl alcohol (ethanol). Employees are encouraged to always read the medication label for content. For example: Vicks Nyquil™ is 25% (50 proof) ethyl alcohol, Comtrex™ is 20% (40 proof), Contac Severe Cold Formula Night Strength™ is 25% (50 proof) and Listerine™ is 26.9% (54 proof).

Amphetamines: "speed," "uppers," etc.

Cannabinoids: THC, marijuana, hashish, "pot," "grass," "hash," etc.

Cocaine: "coke," "crack," etc.

Phencyclidine: PCP, "angel dust."

Opiates: Narcotics, Heroin, Codeine, Morphine, "smack, dope, etc..."

* An employer must test for these five (5) substances in order to be certified. The Rules & Guidelines of the Drug-Free Workplace Program do not prohibit Galen from testing for a broader range of substances. If you decide to test for additional drugs, it is advised that they be included on this list.

Peer Assistance Programs for Healthcare Practitioners:

A. Tennessee Medical Foundation-M.D.s and D.O.s
(615) 467-6411

B. Tennessee Professional Assistance Program-Nurses
(615) 726-4001

SMOKE & VAPE FREE CAMPUS

PURPOSE:

Smoking and secondhand smoke are known to cause serious lung diseases, heart disease and cancer. For this reason, Galen Medical Group is committed to providing a safe and healthy workplace and to promoting the health and well-being of its employees. As such, the following policy has been adopted and applies to all employees of Galen Medical Group.

POLICY:

It is the policy of Galen Medical Group to prohibit smoking and vaping on all company owned or leased premises to provide a safe and healthy work environment for all employees. Smoking is defined as the “act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette or pipe of any kind.” Vaping refers to the use of electronic nicotine delivery systems or electronic smoking devices such as e-cigarettes, e-pipes, e-hookahs and e-cigars.

SCOPE:

This policy applies to:

- All areas of buildings occupied by company employees.
- All company-sponsored offsite conferences and meetings.
- All vehicles owned or leased by the company.
- All private vehicles parked on company premises.
- All company employees.
- All visitors (customers and vendors) to company premises.
- All contractors and consultants and/or their employees working on company premises.
- All temporary employees.
- All student externs/interns.

PROCEDURE:

1. Employees will be informed of the Galen Medical Group Tobacco-free policy through signs posted throughout properties owned or leased by Galen, including company owned vehicles.
2. Visitors will be informed of the Galen Medical Group Tobacco-free policy by their hosts, the meeting invite, email correspondences and signs posted throughout the properties owned and operated by Galen. Any visitor observed using tobacco or electronic cigarettes on owned or leased premises will be asked to discontinue in a tactful manner.
3. An employee who chooses to leave campus for a smoke/vape break must clock out for the duration of the break.

COMPLIANCE AND ENFORCEMENT:

1. Any individual may report a good-faith concern about a violation of this policy using the following procedure:
 - a. Concerns about employees should be directed to the employee’s immediate manager or the Director of Human Resources.
 - b. Complaints about the application of this policy should be brought to the attention of the Human Resources Director for resolution.

- i. The complaint should be submitted in writing and should identify specific objections.
 - ii. The Human Resources Director will investigate the complaint and resolve it in accordance with the policy.
2. Employees who violate this policy will be subject to disciplinary action in accordance with the progressive disciplinary policy in the Galen Medical Group Employee Handbook.

CESSATION RESOURCES:

www.lung.org/stop-smoking

www.quit.com

www.cdc.gov/tips

EMPLOYEE INFLUENZA VACCINATION

POLICY: Galen Medical Group, P.C. ("Galen") shall take steps reasonably necessary to mitigate avoidable transmission of the influenza virus to patients or visitors ("the Public") at any Galen office, clinic, or lab (collectively "Facility"). To that end, all those employees who can reasonably be expected to come into contact or close proximity with the Public or with other Galen clinical staff while on duty shall be vaccinated each year in accordance with the then current CDC Guidelines respecting the influenza virus unless:

- A. A documented contraindication is present or suspected; or
- B. The employee certifies that immunizations conflict with employee's religious beliefs.

If either exception is present, or if vaccine is unavailable during the influenza season (as determined by the Medical Director), then each employee subject to this Policy shall adhere to the Medical Director's recommendations with respect to infection control while on duty in the presence of the Public. Written medical information obtained from an employee for purposes of screening for contraindications (as set forth on the "EMPLOYEE INFORMED CONSENT TO INFLUENZA VACCINE") shall be maintained in a separate file by the Medical Director and apart from the employee's personnel record. Such information may be used only for purposes of the employee's medical care and treatment, or as necessary or appropriate to enforce this Policy. Person's administering vaccinations shall be instructed as to the confidentiality of each employee's medical information disclosed by the employee in the course of effecting this Policy. This Policy should be reviewed by the Medical Director prior to each new flu season.

PURPOSE: The principal mission of Galen is to provide quality health care for our patients. Failing to reduce the risk of influenza while patients are in our care is inconsistent with that mission and demonstrates disrespect to both patients and co-workers. Health care professionals also have an ethical duty to provide care to the suffering. This duty must be weighed against competing personal obligations and risks. Influenza vaccinations are proven generally safe and effective. Therefore, all employees of Galen who are at risk of acting as a carrier of influenza while on duty should be vaccinated each year, consistent with CDC guidelines, and subject to appropriate screening for contraindications.

DISCIPLINE: Failure to comply with this policy will result in disciplinary action as outlined in Galen's Handbook. In addition, employee's days absent from work on account of sickness during flu season (as determined by the Medical Director) are not eligible for ETO payments for such absences unless a cause unrelated to influenza is documented by the employee. An employee who chooses to not receive the influenza vaccination will be required to wear a mask during the high-risk influenza season as determined by the Medical Director.

EMPLOYEE TDaP VACCINATION

POLICY: Employees of Galen Medical Group, P.C. ("Galen") should take steps to mitigate susceptibility to, and/or transmission of, the Pertussis bacterium to patients, visitors, or coworkers. Every employee should seek to be vaccinated in accordance with current CDC Guidelines respecting Tetanus, Diphtheria, and acellular Pertussis (TDaP) vaccinations for health care workers:

- A. A single dose of TDaP will be offered at no cost to Galen employees who have not previously received TDaP and who have patient contact.
- B. Priority shall be given to vaccinating (i) those employees who have direct contact with pediatric patients; and (ii) those having no record of a TDaP vaccination.

PURPOSE: The principal mission of Galen is to provide quality health care for our patients, as well as provide a safe workplace for employees. The CDC has long recommended Tetanus, Diphtheria, and acellular Pertussis (TDaP) vaccinations for health care workers, particularly those exposed to pediatric patients. Specifically, Pertussis (whooping cough) is a highly contagious and serious respiratory disease. More than 41,000 cases and 18 pertussis-related deaths were reported to the CDC in 2012. Some of our pediatric and adult patients were also diagnosed with Pertussis in 2012. Failing to reduce the risk of Pertussis for patients in our care is inconsistent with our mission and demonstrates disrespect to coworkers. Additionally, health care professionals have an ethical duty to maintain infection control. TDaP vaccines are very safe and generally effective. Subject to appropriate screening for contraindications or demonstrable religious objections, all employees of Galen shall be vaccinated consistent with CDC guidelines.

DISCIPLINE: An employee's unexcused failure to vaccinate pursuant to this policy may be considered as a failure to maintain infection control standards in any periodic review of the employee's job performance.

SOCIAL MEDIA

POLICY: All persons have a moral duty and personal legal responsibility to avoid untruthful, defamatory communications, or otherwise truthful communications which unfairly cast others in a false light. Unless an employee's defamatory communications have specific legal protection, such as to report illegality, employees may be subject to discipline for breaches of confidential information, defamatory statements, medical advice given acting on behalf of Galen, or otherwise truthful statements that unfairly cast any Protected Person in a false light.

DEFINITIONS:

Protected Person[s] include Galen, its physicians, other employees, patients, and other medical professionals, health care institutions, or businesses associated with Galen.

Social Media includes all means of communicating or posting information or content of any sort on the Internet, including to an employee's own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Galen. Without limitation, some specific examples of Social Media include:

- a. You Tube
- b. Facebook
- c. iTunes
- d. LinkedIn
- e. Twitter
- f. Blogs

GUIDELINES:

Personal Legal Responsibilities: By law an employee acting outside the scope of his or her employment is solely and ultimately responsible for what that employee may post online. An employee should be mindful that any unprivileged conduct that adversely affects the employee's job performance, the performance of other employees, or otherwise adversely affects physicians, patients, other Protected Persons, or Galen's legitimate business interests may result in disciplinary action up to and including termination.

Galen Policies: An Employee must read and be familiar with Galen policies related to employee conduct, including without limitation, Galen's:

- a. Privacy Policy 1.2, Complaints Regarding Privacy and Confidentiality of PHI;
- b. Sexual Harassment Policy;
- c. Anti-Harassment Policy; and
- d. Code of Conduct.

Patient Privacy: You are prohibited from posting any content that is personal health information including patient images on any Social Media Site. You are also prohibited from using the Social Media Site to provide medical advice or medical commentary by non-Galen physicians or to use the Social Media Site to make, recommend or increase referrals to physicians who are not employed by Galen Medical Group. If a patient contacts you via social media, you may provide the following response: "It is not appropriate to discuss medical care or health information on social media. If you have a question during business hours Monday through Friday, you may contact Galen Medical Group at (xxx) xxx-xxxx. After business hours, you may speak with our on call provider at (xxx) xxx-xxxx. If you are experiencing an emergency, please call 911 or go to the emergency room immediately."

Galen's Proprietary Information: An employee may be subject to discipline for any release of Confidential or Proprietary Information that the Employees knows, or should have known, is

confidential or proprietary. Employees should never post information regarding the development of systems, processes, or products, or internal reports, policies, procedures or other internal business-related confidential communications.

General Guidance: In general, inappropriate postings are those that contain discriminatory remarks, harassment, and threats of violence, or similar unlawful conduct. Unlawful communications will be subject to disciplinary action. To avoid even unintended or imprudent communications by any means or media, employees should always be respectful, fair and courteous to other employees, physicians, patients, visitors, and other Protected Persons. Employees should take advantage of the Galen Open Door Policy to make complaints or vent frustrations. In making postings to any Social Media, employees should also avoid using statements, photographs, video or audio that could be viewed as malicious, obscene, threatening, intimidating, that disparage Protected Persons, that constitute harassment or bullying, or that could be deemed to contribute to a hostile work environment. Employees must always be honest and accurate when posting information or news, and quickly correct any mistakes (even though almost all deleted postings can still be searched). Rumors should always be presumed false.

Website Links: An employee should not create a link from a personal blog, website or other social networking site to a Galen website without first providing identification as a Galen employee.

Opinions: Unless it relates negatively to any Protected Person, an employee may express personal opinions. Unless clearly authorized, an employee should not represent that the employee is a spokesperson for Galen. If Galen is a subject of the content created by the employee, the employee should make clear that the employee's views and opinions do not necessarily represent the views and opinions of Galen, other employees, or physicians.

Using social media at work:

Employees should refrain from using Social Media while on work time or on Galen equipment, unless it is work-related as authorized by the Employee's supervisor or manager. Employees should avoid using the employee's Galen email address to register on social networks, blogs or other online tools utilized for personal use.

No Retaliation:

Galen prohibits taking negative action against any employee for reporting truthful violations of this policy. Any employee who retaliates against another employee for reporting a possible deviation from this policy, or for cooperating in an investigation, will be subject to disciplinary action, up to and including termination.

EMPLOYEE ACCESS TO PERSONAL HEALTH RECORDS

POLICY: Galen maintains protected health information ("PHI") in either paper or electronic format on each patient treated at one of its facilities. Standards of privacy and access for every Galen employee with respect to (a) his or her own medical information, and (b) the PHI of legal dependents and other Galen patients for whom the employee may have assumed personal responsibility, are the same standards of privacy and access guaranteed to every other Galen patient; provided, however, the specific employee medical information is not already separately

maintained by Galen for compliance with applicable employment and safety laws and regulation. Neither the HIPAA Privacy Rule nor the Security Rule covers employee medical information maintained for employment and safety purposes.

PURPOSE:

Galen maintains the privacy of employee PHI and provides each employee appropriate access to his or her own PHI in the same manner as other Galen patients. In order to maintain medical record documentation standards and documentation integrity, however, Galen prohibits unnecessary or inappropriate access by employees to their personal medical records through any of Galen's internal clinical information systems. Employees may only use Galen's internal clinical information systems to access medical information, including PHI, as their job may require, and then subject to all restrictions imposed by law or other Galen policies.

PROCEDURE:

- A. Employees who are patients of Galen are entitled to access their own PHI only as provided in Patient Privacy Policy 3.6, "Access of Individual to Protected Health Information." Employees may make written requests or may access their personal medical information through Galen's online patient portal. An employee may not for any reason use his or her work-related access through any internal information system to view his or her own health information.
- B. Employees who serve as "Personal Representatives" of other Galen patients are entitled to access those health records only in accordance with Uses and Disclosures of Protected Health Information Requiring Personal Representatives (PtP 2.6). Under no circumstances may an employee access the PHI of his/her spouse, partner, child, family member or friend by any means if that employee lacks necessary authority from that person, and then only if the employee is certain that the employee's access is not prohibited by law or other Galen policies, in particular Uses and Disclosures of PHI to Minors Through Web Portal (PtP 2.8).
- C. If during the ordinary course of performing the duties of his or her job, (1) an employee believes that he or she should access the PHI of his/her spouse, partner, child, family member or friend, and (2) the employee believes such access is not prohibited by law or other Galen policies, then (3) the employee must nonetheless seek prior authorization from a supervisor or physician caring for that patient.
- D. As with any medical record, each employee is strictly prohibited from deleting, altering, or amending their own medical record, or the medical records of a spouse, partner, child, family member or friend, through Galen's internal information systems. Employees, as with other Galen patients, are entitled to request an amendment to such records in accordance with Patient Privacy Policy 3.2, "Patient Right to Amend Patient Health Information."
- E. All Galen systems and electronic medical records are subject to continuous audit to detect inappropriate access.
- F. Inappropriate or unauthorized access by an employee (1) to his or her own medical information and/or (2) to the PHI of legal dependents or other Galen patients for whom the employee may have assumed personal responsibility, will result in corrective action up to and including termination.

LEGAL MATTERS

No employee is authorized to settle, compromise, or negotiate on behalf of patients, clients, or Galen, any circumstances or matters pertaining to any legal liability of Galen or its patients or clients. All matters pertaining to any and all legal matters must be referred to your supervisor.

Employees who fail to comply with this policy will be subject to discipline up to and including termination.

OPEN DOOR POLICY

Galen Medical Group is committed to effectively solving problems, concerns or complaints of the employees, physicians, customers and other guests. In order to achieve that commitment, Galen has established an open door policy and/or problem solving procedure.

Any problem, concern or complaint that cannot be handled by the employee, should follow the following steps:

- 1) Contact the immediate supervisor
- 2) Contact the Practice Manager
- 3) Contact the Human Resources Director
- 4) Contact the Administrator

Most problems, concerns or complaints are resolved either by employees or immediate supervisors. However, occasionally the issue involves the supervisor and/or Practice Manager. In this event, the employee is encouraged to contact the Human Resources Director for direction.

STANDARDS OF CONDUCT POLICY

To function effectively, every organization must develop policies and procedures to protect its clients and to ensure that co-workers' and the company's rights are respected. Galen Medical Group is no exception. Generally, conduct that may be disruptive, unproductive, unethical, or illegal will not be tolerated.

Violation of this Standards of Conduct Policy may lead to corrective or disciplinary action, up to and including discharge, depending on the circumstances of the individual case. The following is a non-exhaustive list of conduct that may violate this Policy:

- Falsifying records.
- Engaging in fraud.
- Removing employer property from the premises without authorization.
- Stealing or attempting to steal employer or employee property.
- Being habitually tardy or absent.
- Engaging in poor timekeeping.
- Fighting on employer property at any time.
- Being under the influence of intoxicating substances on employer property at any time.
- Being insubordinate.
- Using or abusing employer time, property, materials, or equipment without authorization.
- Gambling on employer premises at any time.
- Sleeping on the job.
- Using offensive or profane language on company premises.
- Bringing illegal or unauthorized weapons onto employer premises.
- Being absent from work without authorization during scheduled work hours.
- Defacing employer property.
- Engaging in criminal activity.
- Violating or abusing employer policies.
- Neglecting job duties.
- Bringing the organization into serious disrepute.

The company may consider an employee's job performance, prior violation of work rules, and other relevant circumstances in determining whether to counsel, warn, suspend, or discharge an employee. It is up to the employee's supervisor and the company's management to decide whether corrective action, up to and including dismissal, is appropriate.

This policy is not intended to preclude or dissuade employees from engaging in communications or activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits, or terms and conditions of employment.

PROGRESSIVE DISCIPLINE

Progressive discipline may be initiated for various reasons, including, but not limited to, violations of the employer's Standards of Conduct Policy or other policies or rules, or for poor job performance. The severity of the action generally will depend on the nature of the offense and on the employee's record, and may range from a verbal warning to immediate termination.

Progressive discipline may progress through the following sequential steps:

1. Verbal Warning
2. Written Warning
3. Suspension
4. Termination

Any and all of these steps may or may not be utilized depending upon the individual circumstances and the nature of the infraction. Moreover, exceptions or deviations from the normal procedure may occur whenever the company deems appropriate. Furthermore, certain types of behavior may result in immediate termination without resort to the progressive discipline guidelines.

Nothing in this policy shall confer upon the employee any right to continue in the employment of Galen, nor shall it interfere with or restrict in any way the rights of Galen to terminate the employee at any time, for any reason, with or without cause.

RULES OF CONDUCT

Rules of conduct are a necessary part of employee relations and have been established to support the goals Galen Medical Group. Managers seek positive ways to motivate employees to perform according to rules of conduct. Despite each manager's desire to solve employee problems in a positive manner, Galen recognizes at times that this is not possible. For this reason, a program of Progressive Disciplinary Action has been established to ensure employee behavior is consistent with Galen's rules and policies. Some violations are more serious than others. Disciplinary action generally consistent with certain specific violations is listed on the following pages. This list of violations and discipline is NOT exclusive and is NOT intended to imply any employee may only be disciplined or terminated for the reasons specified and only in the manner specified.

POLICIES SUBJECT TO CHANGE

Galen continually reviews the personnel policies and employee benefits and reserves the right to revise, modify, supplement, amend, delete or rescind any of the provisions contained in this handbook from time to time as it deems appropriate, in Galen's sole and absolute discretion.

This handbook does not represent an exhaustive list of Galen's policies, but is designed to give guidance in connection with many essential personnel policies.

The success of Galen and the security of its employees can be assured only as we work harmoniously together for progress. Our joint efforts can result in the type of future which provides opportunity for individual and organizational growth.

In line with our goal of maintaining a well-managed company, we have established policies and procedures covering our personnel program. They are important to continued efficient operations and the fair treatment of all employees.

This Employee Handbook is designed to provide you with an overview of our policies and includes those subjects which most often affect you and your work. If you have any questions regarding any aspect of your relationship with Galen, or the specific requirements of your job, please do not hesitate to ask for clarification.