



Code of Conduct

The time is always right to do the right thing.

—Dr. Martin Luther King, Jr.

A letter from Javier Rodriguez

At DaVita, we take great pride in providing life-sustaining care to our patients, caring for our teammates, and holding ourselves to a high standard as a corporate citizen. We are committed to doing the right thing and conducting our business activities in compliance with our policies, procedures and applicable laws and regulations. Our Mission—to be the Provider, Partner, and Employer of Choice—can be achieved only if each of us lives these commitments.

Our Code of Conduct is central to our Mission and Core Values and is an integral part of who we are as a Village. It is the foundation for our policies and procedures, which provide additional, more detailed, guidance on expected behaviors. Our Code is the guiding reference tool for all DaVita teammates to do the right things in the right way to protect our patients, our teammates and the Village as a whole. It helps us make the right choices both in our daily work and in our long-term strategy.

It is my honor to lead our DaVita Village and I am proud of the work we do every day. It is important that we all are familiar with our Code of Conduct and use it as a guide in what we do. We all must remain focused that our words and actions reflect the right behavior to live our Mission and Core Values. Thank you for your dedication to serving our patients, each other, and our communities.

One for All!



Javier Rodriguez,
CEO & Mayor of the Village



CODE OF CONDUCT'S PURPOSE

To be a road map for the Village, guiding teammates to make the right choices in their daily activities.

Table of Contents

Introduction

Our Responsibilities	4
How to Use This Code	5

Our Compliance Program

Chief Compliance Officer and the Compliance Team	6
Policies and Procedures and the Code of Conduct	6
Compliance Training	6
Compliance Hotline	7
Obligation to Report	8
Non-Retaliation	8
Internal Investigations	9
Responding to External Investigations	9

Service to Our Patients

Quality Patient Care	10
Qualified Providers	10
Patient Confidentiality	11

Relationships with Others

Business Relationships	12
Physician and Other Provider Relationships	13
Patient Relationships	14
Business Courtesies	14

Avoiding Conflicts of Interest

General	15
Outside Employment	15
Business Opportunities	16
Friends and Relatives	16

Respect Each Other

Equal Employment Opportunity	17
Legal Employment	17
Drugs and Alcohol	18
Harassment	18
Health and Safety	19

Business Practices

Proper Coding, Billing and Patient Accounting	20
Records Retention	20
Accurate Financial Records	21

Protecting DaVita Assets

Protection and Proper Use of DaVita Assets	22
External Communication	22
Insider Trading	23
Social Media Sites	23

Obeying the Law

Antitrust Laws	24
Anti-Corruption and Anti-Bribery Laws	25
Anti-Kickback Laws	26
Patient Inducement Prohibition Laws	26
The False Claims Act	26
Marketing and Advertising Practices	26

Our Communities

Political Action	27
Charitable Giving	27

Conclusion	28
Resources to Support Making the Right Choice	29

Our Responsibilities

The Code of Conduct (the Code) is a guide for all teammates, guest teammates, our Board of Directors, physician partners and certain third parties, conducting business on behalf of DaVita's global businesses. Each of us must read, understand and follow the Code of Conduct.

Compliance is everyone's responsibility.

- Read, understand and follow the Code and DaVita's compliance policies and procedures.
- Seek guidance when in doubt.
- Avoid illegal, unethical or otherwise improper behavior.
- Report any suspected violation of DaVita compliance policies and procedures, applicable laws or regulations or the Code. In short, if you see something, you have an obligation to say something.
- Assist with compliance inquiries, audits and investigations.
- Take responsibility and accountability for your actions.
- Notify the Compliance Department immediately if the United States government or any state government sanctions or excludes you from participation in any government-funded program or if you are subjected to similar limitations in one of the other countries in which DaVita does business.

DaVita is committed to doing the right thing and full compliance with all United States federal and state health care program requirements and similar laws, and with requirements in the countries where DaVita conducts business. DaVita may take corrective action, to the extent allowed by law, against any teammate who fails to act in accordance with DaVita policies and procedures, applicable laws and regulations or this Code.



How to Use This Code

DaVita's Code of Conduct helps teammates make the right choices and do the right thing.

This Code is meant to help us conduct business in a legal and ethical manner that is consistent with our Core Values and to guide our understanding of DaVita's compliance department, key policies and procedures, and certain applicable laws and regulations. The standards described in this Code apply in all countries where we conduct business.

We are subject to the laws and regulations of the countries in which we work. In addition, DaVita has specific policies and procedures intended to guide our conduct. If you are unsure about which policies and procedures or laws and regulations apply to your activities, consult your supervisor, the Compliance Department or the Legal Department. We hold our teammates, physician partners, Board of Directors, and certain third parties who conduct business on behalf of DaVita, to the same standards. We expect them all to comply with DaVita's policies and procedures, all applicable laws and regulations and this Code.



Our Compliance Program

The Compliance Program follows our commitment to uphold our Mission and Core Values every day, in everything we do.

Chief Compliance Officer and the Compliance Team

DaVita has a dedicated Compliance Department, known internally as Team Quest. Compliance teammates administer the Compliance Program on a day-to-day basis and are always available to answer compliance-related questions and address concerns. The chief compliance officer (CCO) provides oversight to the Compliance Program and directly reports to the Compliance and Quality Committee of the Board of Directors and the chief executive officer (CEO).

Policies and Procedures and the Code of Conduct

The Compliance Department has issued policies and procedures and the Code of Conduct to help guide our actions. Compliance policies and procedures provide guidance on specific topics and business activities, whereas the Code is a guide to the overall conduct of our global operations.

Compliance Training

All teammates, guest teammates, medical directors, joint venture partners, select vendors, and other third parties, as required by contractual obligation, must complete DaVita's compliance training. This training is a critical part of the foundation of our Compliance Program.



U.S. teammates, click here to learn more about:
[Corporate Compliance Program Description](#)
[Compliance Program Oversight](#)
[Compliance Written Standards of Conduct](#)
[Compliance Training](#)

Compliance Hotline (DaVitaComplianceHotline.com)

The Compliance Hotline is available 24 hours a day, seven days a week. The hotline is managed by a third party and is secure and confidential. In most countries, including the United States, teammates may choose to remain anonymous. Compliance Hotline reports must be made in good faith.

Local privacy laws outside the United States may affect availability and terms of use of the Compliance Hotline. Consult your supervisor or local compliance lead for information regarding local use of the Compliance Hotline.

FAQ

Q: If I make a report to the Compliance Hotline, will I have to speak to a DaVita teammate?

A: No. The Compliance Hotline is staffed by a third-party contractor with trained personnel who will take your report and provide it to the Compliance Department via an automated system.

Q: Can I report anonymously?

A: In the United States, you may report anonymously. Outside the United States, it depends on local law, as some countries have laws that prohibit anonymous reporting. Please refer to your local Compliance Hotline Policies or local compliance lead for more information.

Q: What issues should I report to the Compliance Hotline?

A: You should report suspected or actual violations of DaVita's Compliance policies and procedures, applicable laws and regulations, and this Code, such as improper gifts, bribes or kickbacks, falsification or destruction of information, health care billing concerns, conflicts of interest and misuse of DaVita funds or property.

Q: How long will it take to follow up on my complaint?

A: All Compliance Hotline reports are investigated within a reasonable time frame based on priority. You can use the report number and PIN provided by the Compliance Hotline vendor to check on the status of your report, although detailed information regarding an outcome or findings is not provided.

Q: Is there any way my identity can be found out when I file a Compliance Hotline report?

A: DaVita strives to maintain the confidentiality of individuals who report concerns to the Compliance Hotline. However, the reporter may become known during an investigation based on factual circumstances. DaVita will protect the identity of each reporter to the extent possible and prohibits retaliation for reporting compliance concerns in good faith.

Obligation to Report

It is your duty to maintain the highest level of integrity and accountability by reporting to a supervisor, senior management, the Compliance Department, the Legal Department or the Compliance Hotline of any suspected or actual violation of DaVita's policies and procedures, applicable laws and regulations or this Code. Self-reporting is encouraged, and although self-reporting does not exempt or insulate teammates from corrective action, it may be taken into consideration in determining what, if any, corrective action is appropriate.

Failing to report puts both you and DaVita at risk. In short, if you see something, you have an obligation to say something.

Non-Retaliation

We are all expected to raise issues or concerns in good faith and should do so without fear of retaliation. DaVita makes every effort to maintain the confidentiality and anonymity (where permitted by law) of any individual who reports concerns.

DaVita does not tolerate any form of retaliation against anyone who makes a report in good faith or assists with an investigation. Retaliation is an adverse action, such as pay reduction, demotion, termination, intimidation, or threat against an individual for engaging in a protected activity (e.g., raising a good-faith compliance concern).

Our Mission

To be the Provider, Partner and Employer of Choice

U.S. teammates, click here to learn more about:
[Reporting Potential Compliance Violations](#)
[Compliance Non-Retaliation](#)

FAQ

Q: What is retaliation?

A: Retaliation is any adverse action, such as pay reduction, demotion, termination, intimidation or threats against an individual for engaging in a protected activity, in this case making a report in good faith. DaVita prohibits all forms of retaliation.

Q: What does it mean to file a Compliance Hotline report in “good faith”?

A: A report filed in “good faith” means the reporter made a truthful report, without malice or bad intent, and made the report based on a reasonable belief that a potential violation has occurred or may occur.



Internal Investigations

We investigate reported concerns promptly and confidentially to the fullest extent possible. All internal investigations are conducted impartially and without predetermined conclusions. We are all expected to cooperate fully with investigations and any corrective action that is recommended as a result of investigation findings.

Responding to External Investigations

We are committed to appropriately responding to, and not interfering with, any lawful government inquiry, audit or investigation. We will be forthright in our dealings with government officials or employees who are responsible for administering and enforcing the law.

Service to Our Patients

Our patients value DaVita because we deliver quality care and we hold ourselves to the highest standards.

Quality Patient Care

We make a difference in each patient's life by providing quality care. We treat all patients with warmth, respect and dignity, and provide care that is medically necessary and appropriate. We involve patients in treatment planning and decisions affecting their care whenever appropriate.

We do not discriminate in the admission, transfer, discharge or care of patients.

Qualified Providers

Our teammates are appropriately trained to provide high-quality care. Only teammates who are properly trained and have appropriate professional credentials are permitted to provide patient care services.

Before they are allowed to admit or treat patients at a DaVita center, physicians and other allied health professionals are appropriately credentialed as required by applicable laws and regulations. Medical staff who work in our centers are required to adhere to DaVita policies and procedures, applicable laws and regulations, and this Code.

FAQ

Q: I think a nurse may have made a mistake in administering a drug to a patient. When I mentioned it to the nurse, he seemed annoyed and said he would handle it. I am not sure anything was done. Should I do anything else?

A: If you are uncertain about what happened or what to do, talk to your supervisor or the relevant clinical leader. You may also report the issue to the Compliance Hotline. Errors may occur, but with care and attention from everyone, they can be prevented or corrected.

The DaVita Way

The DaVita Way means that we dedicate our Head, Heart and Hands to pursue the Mission, live the Values, and build a healthy Village. It means we care for each other with the same intensity with which we care for our patients.

Patient Confidentiality

DaVita recognizes the sensitive nature of each patient's protected health information (PHI).

We are committed to maintaining patient privacy in accordance with applicable data privacy laws, including the U.S. Health Insurance Portability and Accountability Act of 1996 (HIPAA), its subsequent amendments and all other applicable laws and regulations governing patient privacy and security in countries where DaVita conducts business. We respect and protect confidential information about our patients through our commitment to these privacy principles.

U.S. teammates, click here to learn more about:
[Privacy Principles](#)



FAQ

Q: Mary, my neighbor, was recently admitted to our center. I saw another neighbor when I was shopping. She asked me if I knew how Mary was doing. How should I reply?

A: You should inform your neighbor that you cannot discuss Mary's condition or the services she received and direct her to speak with Mary. You have a professional obligation to respect and protect Mary's privacy. You may only discuss patient treatment or other health information as permitted by DaVita policies and procedures, local laws and regulations and this Code.

Q: Can I provide a copy of a patient's most recent treatment information and lab values to another health care provider?

A: Yes. You can provide patient information to another health care provider for the purpose of treating a patient if permitted by local law. Before doing so, you need to verify the patient's treatment relationship with the health care provider making the request.

Relationships with Others

We strive to build fair, caring, ethical and compliant relationships.

Business Relationships

We treat our business partners, vendors and other third parties with integrity and respect.

We select business partners and vendors based on objective criteria, including quality, price and service. We make partnering decisions based on the supplier's ability to meet our needs. Depending on local laws and proposed business activities, DaVita may screen or conduct appropriate due diligence on our business partners, vendors and other third parties, including to determine if they have been sanctioned by any government entity or are excluded from participation in government programs.



FAQ

Q: A vendor offered to give me a free home computer just for signing a contract between DaVita and his company. Am I allowed to accept the computer?

A: No. We should never allow personal gifts or discounts to influence our judgment in signing a contract. DaVita selects its vendors based on price, quality and service, not on gifts.

Q: Can health care vendors give gifts to an individual teammate?

A: No. To be allowable in the United States, the gift must be provided to a team, center or department, consistent with local policies regarding the acceptance of gifts from vendors and shared by the group. Some examples of acceptable gifts are holiday gift baskets, cookie trays or a box of chocolates. Teammates may also accept promotional items such as office products with a vendor's logo. Outside of the United States, check your country-specific policy for guidance or ask your local compliance lead.

Physician and Other Health Care Provider Relationships

We strive to partner and work only with physicians and other health care providers (HCPs) who comply with DaVita policies and procedures, applicable laws and regulations and this Code. Failure to comply with these requirements may result in serious consequences for teammates, physicians or other provider partners, and DaVita.

Our business contracts with physicians and other HCPs address legal requirements governing the arrangement and, where appropriate, set forth expectations regarding compliance with applicable DaVita policies, laws and regulations and this Code.

We accept patient referrals and admissions based on patients' medical needs and our ability to render the needed services. We do not directly or indirectly give, offer, solicit or accept anything of value in exchange for patient referrals.

FAQ

Q: Can I invite physicians to a suite at a sporting event for a presentation and buffet?

A: No. Although it is possible to conduct legitimate business at a sporting event, attendance at a sporting event is inherently entertainment. Providing entertainment to a physician or other referral source could create the appearance that the purpose of the event is to generate business by providing a valuable personal benefit. Accordingly, attendance at sporting events and other entertainment or recreational events is not permitted.

Q: May I provide a physician with wine as a gift?

A: Teammates in the United States may not give alcohol to physicians or other referral sources as a gift. For teammates in countries other than the United States, this will be dependent upon the local laws of the intended recipient's home country. Check the business courtesies and gift policies for your country for specific guidance.

Q: I want to give another teammate a present for her birthday. Does business courtesies or gift policies apply?

A: No. These policies do not apply to giving or receiving gifts between DaVita teammates.

Patient Relationships

We must avoid entering into relationships with patients that could result in an actual or potential conflict of interest. We do not want our patients to think they will receive better or worse care if they have outside relationships with their health care providers at DaVita. We strive to have open, professional relationships with our patients.

Business Courtesies

People who work together sometimes exchange business courtesies such as meals or gifts as an expression of goodwill and kindness or as part of routine business. Because of regulatory concerns, we exchange business courtesies with our business partners only in limited circumstances. We never use gifts or other incentives to improperly influence relationships or business outcomes. We never offer, give, solicit or receive any form of bribe, kickback or improper inducement.

Governments have strict laws and regulations regarding business courtesies. We do not provide any items of value to any government official or employee or a government intermediary except in limited circumstances permitted by DaVita policies and procedures and local laws and regulations.

U.S. teammates, click here to learn more about:

[Business Courtesies](#)

[Acceptance of Gifts](#)

FAQ

Q: A patient wants to pay my son to do odd jobs around his home. Can I let my son take the job?

A: No. As a general rule, teammates should avoid business relationships with patients. We do not want patients to think they will receive better or worse care if they “help” our teammates and their families.

Q: May I give a gift to a patient?

A: Generally, you should refrain from giving and receiving gifts or anything of value with patients; however, teammates should consult their local policy for specific guidance. Gifts should never be given to induce patients to use or continue to use DaVita as a health care provider.

Q: What is a business courtesy?

A: A business courtesy includes any item, service, benefit, or anything of economic or personal value exchanged between business partners (or potential business partners), which can include gifts, business meals and other gratuities.

Our Core Values

Service Excellence • Integrity • Team • Continuous Improvement • Accountability • Fulfillment • Fun

Avoiding Conflicts of Interest

We must be able to identify and disclose potential conflicts of interest and avoid making decisions where it may appear our independence is compromised.

General

We should refrain from conducting or entering into business, financial or other relationships that conflict with the interests of DaVita or our ability to perform our DaVita duties or that otherwise compromise our professional judgment. We do not accept employment or fees from business partners, vendors, contractors, patients, competitors, physicians or other referral sources, governments or other third parties if we have the ability to influence their relationship with DaVita.

Outside Employment

Outside employment must not interfere with our duties at DaVita. This may include employment or other arrangements with DaVita business partners, vendors, contractors, patients, competitors, physicians or other referral sources, governments or other third parties. A teammates' outside employment must not limit their ability to fully perform their duties at DaVita. Teammates must disclose and discuss with their supervisors all outside jobs, relationships or transactions that may create a conflict of interest and report to the Compliance Department in accordance with policies and procedures.

U.S. teammates, click here to learn more about:
[Conflict of Interest](#)

FAQ

Q: Am I allowed to have a second job?

A: Yes, as long as the second job does not conflict with your work at DaVita. If you wish to have a second job, you need to disclose the potential job to your supervisor to ensure it will not impact your ability to fulfill your obligations to DaVita, result in an improper benefit to you or DaVita or otherwise create a conflict of interest.

Q: Is it against the rules for members of my family to provide products or services to DaVita?

A: Not necessarily. Your relationship to this person may not influence a purchasing decision, so to avoid a possible conflict of interest, you should inform both your supervisor and the Compliance Department of any close personal or family relationship with a vendor or potential vendor before arranging to use their services.

Business Opportunities

Business opportunities discovered through our work at DaVita belong to DaVita. We owe a duty to DaVita to advance its legitimate business interests. Teammates are prohibited from using DaVita's confidential or proprietary information for personal use or gain.

Friends and Relatives

We should not participate in an existing or potential DaVita decision involving someone with whom we have a personal relationship that could impair objectivity when making business decisions.

A teammate's close relationship with a DaVita business partner, vendor, contractor, patient, competitor, physician or other referral source, government official or employee or other third party does not automatically mean there is a conflict of interest. However, because these situations present the possibility of a conflict of interest, you should always discuss with your supervisor or the Compliance Department, following the specific guidance for your country.



Respect Each Other

We are committed to providing a supportive work environment where teammates have the opportunity to reach their full potential.

Equal Employment Opportunity

We are committed to providing a workplace that is diverse and free from improper discrimination. We hire and promote teammates based on their ability to demonstrate excellence in their work and dedication to meeting our patients' needs or our business needs. Our interactions with one another should always be fair, objective and professional.

Each of us is responsible for supporting fair employment values by complying with applicable labor and employment laws, including anti-discrimination laws. We will make reasonable accommodations for individuals with physical or mental disabilities, in accordance with applicable laws. If you have questions or concerns about unlawful discrimination or harassment in the workplace, bring your issues to your supervisor or the Human Resources Department.

Legal Employment

We comply with local laws applicable to our business. We must maintain all credentials, licenses and certifications that are necessary to perform our jobs. Teammates in positions that require professional licenses, certifications or other credentials are responsible for keeping them current and active.

Where permitted by each country's laws, DaVita has implemented screening procedures to identify individuals that governments have publicly sanctioned or excluded from participation in government programs. These procedures include checks of publicly available databases such as the U.S. Department of Health and Human Services Office of Inspector General (OIG) list of excluded individuals and entities, Office of Foreign Asset Control (OFAC) specifically designated nationals and blocked persons lists and General Services Administration's (GSA) System for Award Management (SAM). If you become aware that you or any other teammate is, or may be, sanctioned or excluded from any government program, you must immediately notify the Compliance Department.

U.S. teammates, click here to learn more about:
[Equal Employment Opportunity \(see section 2.1\)](#)
[Teammate Credentials \(see section 2.12\)](#)



FAQ

Q: What does it mean to be a U.S. Department of Health and Human Services Office of Inspector General (OIG) excluded individual or entity?

A: An OIG excluded individual or entity is a person or company that has been excluded from participating in health care programs funded by the U.S. federal government or state governments. Under U.S. law, anyone who hires an OIG-excluded individual or company may be subject to civil monetary penalties.

Q: How does DaVita identify excluded individuals?

A: DaVita checks if individuals and entities involved in DaVita's U.S. business operations are on any publicly available government list of excluded individuals and entities, before and during the individuals' or entities' involvement in DaVita's U.S. operations.

Drugs and Alcohol

To protect our patients, teammates, business partners, vendors and others, DaVita is committed to a drug-free workplace and employing a drug-free workforce. The use of drugs that are illegal under federal law, or misuse of prescribed drugs or alcohol by teammates, is inconsistent with the commitment of DaVita to provide a safe, healthy, secure and productive environment for our teammates and patients. In special instances, alcohol may be served at DaVita-sponsored events, where permitted by law and culturally appropriate. Each of us should use good judgment when deciding to consume alcohol in social situations and will be held personally accountable for our actions and decisions. A teammate with problems involving drugs or alcohol is strongly encouraged to seek help from appropriate internal and external resources.

U.S. teammates, [click here to learn more about: Drug and Alcohol Policy \(see section 5.13\)](#)

Harassment

We should all feel safe and welcome while we are at DaVita. Therefore, DaVita will not tolerate any form of unlawful discrimination or harassment, including sexual harassment, in the workplace.

Anyone who experiences or observes unlawful harassment should immediately report the incident to a supervisor or the Human Resources Department. Similarly, supervisors who learn of any alleged incident or concern of unlawful harassment should immediately report it to the Human Resources Department. The Human Resources Department will promptly and thoroughly investigate any complaints and take appropriate action.

FAQ

Q: One of my teammates likes to tell jokes during down time. The jokes are often sexual in nature and inappropriate. Is there anything I can do?

A: Yes. DaVita does not tolerate such behavior. If you feel comfortable with the teammate, you may ask the teammate to refrain from telling inappropriate or offensive jokes. If you do not feel comfortable speaking with the teammate, discuss the situation with your supervisor (unless the teammate is your supervisor) or the Human Resources Department.





FAQ

Q: I witnessed another teammate dumping chemicals from a center in the city drain. What do I do?

A: Chemicals could be harmful and must be handled and disposed of in the correct manner to protect our local communities' environment. You should report the incident to your supervisor or designee at the center and others as required by your local Health and Safety policies and procedures.

U.S. teammates, [click here to learn more about: Health and Safety Policies \(see section 5.19\)](#)

Health and Safety

Each of us needs to do our part to keep our centers and business offices clean and well-functioning. We follow the health and safety policies and procedures that are designed to ensure we are meeting all applicable laws and regulations as they apply to our workplace. If we witness an injury, accident or dangerous situation, we must immediately report it to our supervisor so immediate action can be taken to resolve the issue.

Providing a healthy and safe environment extends beyond patient care into our communities. Our centers and business offices are part of our larger communities, and we are committed to their continued health as well. We are committed to conserving resources and reducing our ecological footprint by complying with environmental laws.

DaVita does not tolerate violence or threats of violence and prohibits all persons who enter DaVita property from carrying a weapon, regardless of whether the person is licensed to carry the weapon. Teammates are never permitted to have weapons in their possession while conducting DaVita business.

Business Practices

Our reputation is one of our most valuable assets. It is up to all of us to protect DaVita's reputation. We will engage in fair and honest business practices.

Proper Coding, Billing and Patient Accounting

DaVita documents patient care accurately, completely and in a timely manner. Medical records are written evidence of the care we deliver to our patients. We educate our teammates and work diligently to prevent knowingly creating records that contain any false or misleading information.

The claims we submit for payment or approval must be accurate and contain properly documented information. We bill only for goods or services that we have provided. DaVita has implemented a process designed to identify mistakes in claims or reimbursements and make timely refunds.

Records Retention

We are committed to maintaining thorough and accurate records. We maintain documents as required by DaVita policies and procedures and applicable laws and regulations. We do not destroy documents or recommend their destruction for any improper reason.

FAQ

Q: What do I do if I see another teammate make a mistake in a patient's medical record?

A: There are very specific procedures for correcting mistakes in a medical record. You should review the incident with your supervisor and the teammate who made the mistake. If you are not comfortable approaching your supervisor, you can always contact the Department or the Compliance Hotline.

Q: I was told by my supervisor to process charges for services even if the chart note did not support the level of service. What should I do? Where should I report this problem?

A: If you are comfortable doing so, you should discuss your concerns with your supervisor. If you are not comfortable approaching your supervisor, you can always contact the Compliance Department or the Compliance Hotline.

Q: A fellow nurse called me from home after she completed her shift. She told me that she had forgotten to enter a verbal order she received for a change in medication. The nurse asked me to log the change into the patient's chart and to use her initials. She said charts are often updated in this way and no harm is done. Is that okay?

A: No. Although the nurse did the right thing by calling to report the chart error, the error should be promptly reported to the supervisor, not entered on the patient's chart. You should never record an order you did not hear. Never sign someone else's signature or initials, and never use another teammate's password. The teammate who took the order and forgot to enter it can make the entry in the medical record as a late entry the next time she is in the center.

Accurate Financial Records

Our financial records serve as a basis for managing our business. Maintaining accurate, complete and truthful financial records is crucial to meeting our obligations to our stakeholders, including investors, business partners, vendors, patients and teammates, and directly impacts our compliance with financial, legal and other regulatory reporting requirements. To that end, we maintain a system of internal controls to provide reasonable assurances that all transactions are executed and recorded in a proper manner. In addition, all financial information must reflect actual transactions and conform to industry standards, and we must never falsify or improperly alter information in any records, reports or other documents.



Protecting DaVita Assets

We must protect our company assets from theft, carelessness and waste. We are as careful with our Village resources as we are with our own.

Protection and Proper Use of DaVita Assets

Each of us must protect DaVita assets and ensure their authorized and efficient use. DaVita assets are anything DaVita provides us to do our job, including technology, trade secrets and clinical items. Theft, carelessness and waste directly impact our profitability and carbon footprint. We should use DaVita assets solely for business purposes.

Everyone is responsible for protecting DaVita's intellectual property and business information, even if we leave the Village. Intellectual property and business information is information that may not currently be known by the public or information about DaVita's trade secrets or business plans. As with confidential teammate and patient information, we may share intellectual property and business information with other teammates, business partners, vendors, contractors or third parties only when it is required for business purposes, and where applicable, agreements outlining appropriate use and disclosure of information are in place.

External Communication

Teammates must be extremely careful about disclosing company information. We never disclose any confidential information without authorization.

It may be inappropriate to post our opinions or information about DaVita on the Internet, even if the information is not confidential. Our comments to an external audience may be attributed to DaVita, even if we did not intend that to be the case.

Any statements to the media must be explicitly authorized by DaVita's Communications Department and/or Legal Department.

FAQ

Q: An unknown man called and said he was from a government agency. He requested specific patient information. What should I have done?

A: DaVita is committed to responding to lawful government inquiries but also to appropriately protecting our patients' information. Government requests are typically made in writing and delivered in a formal manner. In a case like this one, please refer the individual to the Legal Department.

Q: I am a small business owner and perform consultations when I am not at DaVita. Can I email clients and fax forms using DaVita computers or fax machines?

A: No. All DaVita assets and supplies are used only to further DaVita's business. Teammates should conduct outside business on their own time and with their own resources.

Insider Trading

We may never use non-public information about DaVita, or acquired through our work for DaVita, for personal gain. In the course of our day-to-day work, we may learn information about DaVita or a publicly traded business partner, vendor or other third party that is not yet available to the general public. The use of such nonpublic, or “insider,” information for purposes of securities trading is strictly prohibited under DaVita policy and procedures, and may be a violation of U.S. securities laws.

U.S. teammates, click here to learn more about:
[Insider Trading](#)

Social Media Sites

We are the face of DaVita and should conduct ourselves accordingly when we discuss DaVita, including on social media. Teammates must follow DaVita policies regarding use of social media and may not speak on behalf of DaVita on social media without prior written permission.

We comply with all copyright, trademark, fair use and financial disclosure laws. The Marketing Department manages DaVita’s U.S. social media channels. Outside the United States, all questions regarding social media use should be directed to the local management team overseeing social media.

U.S. teammates, click here to learn more about:
[Social Media \(see section 5.18\)](#)

FAQ

Q: My family and friends occasionally ask me whether they should buy DaVita stock. Can I give them my opinion?

A: You should not make recommendations to anyone regarding buying or selling of DaVita stock, as such recommendations may be unfairly attributed to the Company and may be misleading. You must not engage in any discussion of company plans, performance and or other important developments that have not been made public. The rules about “inside” information apply whether you buy or sell stock yourself or you give the information (a “tip”) to someone else. If stock is purchased while in possession of material, nonpublic information, the person who gave the tips as well as the person who received the tips and purchased stock will be in violation of federal securities laws.

Obeying the Law

DaVita is committed to complying with laws and regulations. DaVita teammates should understand how the following laws and regulations apply to our work.

Antitrust Laws

We strive to comply with antitrust laws in all our dealings with competitors and customers. Antitrust laws and other laws governing competition are designed to promote and protect free, open and fair competition. These laws apply to conduct at all levels of an organization.

Generally, antitrust laws prohibit:

- Agreements or actions among competitors that unreasonably restrain trade or are inconsistent with concepts of free, open and fair competition, including, in particular, agreements concerning bids, prices, terms and conditions of sale, or customers;
- Abuses of market power;
- The unlawful exchange of confidential or proprietary business information with competitors; and
- Transactions that may substantially lessen competition or tend to create a monopoly, create a dominant position in the market or allow for abuses of market power through unfair methods of competition, as opposed to competition on the merits.

We are committed to achieving success by free, open and fair competition. Teammates should discuss any concerns regarding a particular action or arrangement and the applicability of the antitrust laws with the Legal Department.

U.S. teammates, click here to learn more about:
[Antitrust Laws](#)



Anti-Corruption and Anti-Bribery Laws

When we conduct business internationally, we comply with the U.S. Foreign Corrupt Practices Act (FCPA) and the anti-corruption and anti-bribery laws of the countries in which we do business.

In general, anti-corruption and anti-bribery laws are based on these three principles:

1. Prohibition of bribes to government officials and employees;
2. Prohibition of bribes to individuals associated with non-government entities (“private” or “commercial” bribery); and
3. Obligation to maintain accurate books, records and accounting systems and proper internal accounting controls.

We will not directly or indirectly give, offer or promise anything of value to any government official or employee or other person or entity, with the intent to obtain or retain business or secure an unfair business advantage.

Our business partners, vendors and other third parties are also prohibited from giving, offering or promising anything of value to any individual in violation of the FCPA or other anti-corruption or anti-bribery laws. All payments made on behalf of DaVita must have accurate, and complete written documentation regarding the purpose of the payment.

We will not solicit or accept anything of value from any person or entity seeking, entering into or conducting a business transaction with DaVita that may compromise or appear to compromise our business decisions.

Non-U.S. teammates, [click here to learn more about: Anti-Corruption](#)

FAQ

Q: An affiliated physician is short-staffed at his office practice. Is it okay for my administrative assistant to help him with scheduling and paperwork?

A: No. Providing office assistance to a referral source, like this physician, may be considered a kickback.

Q: A local surveyor/inspector responsible for overseeing my center told me that I can pay him an annual fee to limit the number of surveys/inspections we undergo in the course of a year. Is that okay?

A: No. Paying a surveyor/inspector to survey/inspect you less frequently than normal is a bribe. If anything like this ever arises, refuse the request and immediately contact a member of the Compliance Department.

Q: We are leasing space from a public teaching hospital. One of the hospital's nephrologists has asked to use one of the conference rooms a couple days a week to meet with students. Is it okay to sublease the space to the nephrologist?

A: Yes, as long as a sublease agreement is executed and the nephrologist pays fair market value to use the space. Contact the Legal or Compliance Department for assistance.

Anti-Kickback Laws

We conduct business dealings with physicians and other referral sources in accordance with local laws and regulations, including anti-kickback laws. In the United States, anti-kickback laws generally prohibit providing anything of value to induce or reward patient referrals or the generation of business involving any item or services that is paid for by a state or federal health care program like Medicare or Medicaid. DaVita's policy prohibits improperly accepting, soliciting or providing kickbacks of any kind. We are all responsible for complying with DaVita's anti-kickback policies and all anti-kickback laws that apply to our business.

U.S. teammates, click here to learn more about:
[Compliance with the Anti-Kickback Statute](#)

Patient Inducement Prohibition Laws

We provide high-quality patient care and support to all of our patients with the hope that they continue to choose DaVita to provide their care. In accordance with U.S. federal law, we do not provide financial incentives or gifts to patients for the purpose of influencing the patient's decision to receive treatment with DaVita.

In the United States, the beneficiary inducement provisions of the Civil Monetary Penalty Law prohibit any person from offering anything of value to Medicare or Medicaid beneficiaries that are likely to influence the selection of a particular provider.

Outside of the United States, we follow all relevant laws related to patient inducement.

U.S. teammates, click here to learn more about:
[Patient Inducement Prohibition](#)

The False Claims Act (FCA)

The prevention and detection of fraud, waste and abuse is at the heart of DaVita's compliance program. We educate teammates and applicable business partners on the prevention of fraud, waste, and abuse via policies, procedures, and training including information regarding the U.S. False Claims Act (FCA). The FCA is one of several laws the United States federal government has implemented to prevent and penalize fraud, waste and abuse in federal health care programs. In accordance with the law and our policies, DaVita never knowingly presents, or causes to be presented, a false or fraudulent claim, or knowingly and improperly retains any government overpayment. DaVita has developed policies and procedures that are designed to detect and prevent fraud, waste and abuse and comply with the FCA.

U.S. teammates, click here to learn more about:
[Compliance with the False Claims Act](#)

Marketing and Advertising Practices

We practice honest, straightforward and non-deceptive marketing. Consistent with laws and regulations, we may use marketing and advertising activities to educate the public, increase awareness of our services and recruit teammates.

Our Communities

DaVita is committed to engaging in our local communities.

Political Action

We may support issues of central importance to health care generally, and kidney care specifically, by taking action, as permitted by each country's laws, to ensure policy makers hear from the DaVita care-giving community. Where appropriate, DaVita may invite you to engage in grassroots activities (i.e. letter-writing, phone calls, meetings) related to those advocacy efforts. Participation, or lack thereof, of any activity related to a political initiative sponsored by the DaVita Government Affairs team or other such committees in countries outside the United States has no impact on employment status at DaVita, and no person may be pressured to participate in any such activity. Although we may participate fully in the political process, we may not make any political contribution on DaVita's behalf before first consulting with a member of DaVita's Government Affairs team regarding United States contributions or the Compliance Department for contributions outside the United States.

If individual teammates choose to participate in political activities, they do so solely on their own and may not leave the impression that they speak on DaVita's behalf.

Charitable Giving

Charitable giving (e.g., charitable donations, sponsorships and medical education grants) may be made to third-party entities, on DaVita's behalf, with proper approvals as required by policies and procedures. We do not participate in charitable activities or make donations to improperly induce referrals or to illegally gain an unfair business advantage or in violation of any law.

U.S. teammates, click here to learn more about:
[Charitable Giving](#)

FAQ

Q: I volunteer for a few organizations. May I approach DaVita for a donation?

A: Yes. DaVita may make a charitable contribution if it is not given in order to induce or receive patient referrals or gain an unfair business advantage and you obtain appropriate approvals in accordance with DaVita policies.

Q: Can my center make a donation to a charitable organization or event that is sponsored or associated with a referral source?

A: It depends. Before you make any commitments or donations, you must obtain appropriate approvals in accordance with DaVita policy.

Conclusion

This Code of Conduct is a guide for our daily work.

This Code is just the beginning of the many resources available to teammates. Ultimately, we rely on each teammate to use good judgment and to uphold our Core Values. If you have any questions, please ask your supervisor, senior management the Human Resources Department, the Compliance Department the Legal Department or contact the Compliance Hotline.



Resources to Support Making the Right Choice

For U.S. teammates:

DEPARTMENT	CONTACT	RESOURCES
Compliance (Team Quest)	The Compliance Hotline is available 24 hours a day, 365 days a year, at 1-888-458-5848 or DaVitaComplianceHotline.com . For compliance-related questions, contact the QUESTionLine at QUESTionLine.ethicspoint.com .	Compliance policies, procedures and other resources can be found on the VillageWeb.
Human Resources (People Services)	Teammates may contact the Teammate Support Center at 1-877-732-8482.	Teammate Policies can be found on the VillageWeb.
Privacy (Team Shield)	Have a privacy or security question or concern? Contact the Privacy Office at 1-855-472-9822 or email Privacy@DaVita.com .	Privacy policies can be found on the VillageWeb.

For non-U.S. teammates:

DEPARTMENT	CONTACT	RESOURCES
Compliance (Team Quest)	The Compliance Hotline is available 24 hours a day, 365 days a year, at DaVitaComplianceHotline.com . Telephone numbers by country can be found at DaVita.com/Compliancehotline . For compliance-related questions, contact your country Compliance lead.	International policies in English are on the VillageWeb Policies in the country's native language are stored locally in local repositories (AGIR, Daruma, local server StarPoint).
Human Resources (People Services)	For People Services-related questions, contact your country People Services lead or International People Services team at GlobalPeopleServices@davita.com .	Teammate Policies in the country's native language are stored locally and can be provided on request by the local People Services lead.
Data Privacy	For general data privacy inquiries or concerns, email DataPrivacyInternational@davita.com .	International data privacy policies are housed in AGIR.

Our Mission

To be the Provider, Partner and Employer of Choice

Our Core Values

Service Excellence
Integrity
Team
Continuous Improvement
Accountability
Fulfillment
Fun

The DaVita Way

The DaVita Way means that we dedicate our Head, Heart and Hands to pursue the Mission, live the Values, and build a healthy Village.

It means we care for each other with the same intensity with which we care for our patients.

WE CARE 
EVERY INTERACTION MATTERS

Welcome
Empathize
Connect
Actively listen
Respect
Encourage



Corporate Office

2000 16th Street
Denver, CO 80202

[DaVita.com](https://www.davita.com)

© 2021 DaVita Inc.

Revised September 2013, December 2013, October 2014, October 2016, February 2019, June 2019, March 2021 (U.S.), May 2021 (International)