

**Vero RN Employee Handbook**

**For Vero-Clinical**

**Effective January 1, 2021**



## 1.2 Handbook Introduction

The purpose of this handbook is to provide employees with important information about Vero RN's (henceforth referred to as Vero RN, Vero, or the Company) personnel policies, practices, and benefit programs. This handbook also details the general rules and conditions of employment with Vero RN, and the rights and responsibilities of each employee. All employees are responsible for reading and complying with this handbook. This handbook applies to all employees (with the understanding that different employees may receive different handbooks), and compliance with the policies contained within is a condition of your employment with Vero.

Vero RN reserves the right to modify, rescind, remove, or add to the provisions of this handbook or any handbook supplement at any time at its sole discretion. This handbook does not constitute an employment contract between Vero RN and its employees, nor does it alter the at-will employment relationship between both parties (or, where applicable, the terms of any separate written agreement between the employee and Vero and executed by an authorized Vero official). This handbook is meant to serve as a reference tool for the benefit of each employee; read it carefully and retain it for your records. If you have any questions regarding the contents of this handbook, please direct your questions to the Vero RN Management (except where you are specifically requested to direct matters to other officials).



### **1.3 Vero RN Core Values**

Vero RN prides itself on the following core values, and expects each employee to adhere to these values always:

- **Excellence-** We strive to be the best in all we do. We are committed to delivering value and focused on exceeding our customers' & client's expectations
- **Integrity-** We consistently do what is moral, just, and fair in every situation.
- **Urgency-** We act thoughtfully, decisively and without delay.
- **Adaptability-** We embrace change and evolve to promote growth while maintaining effectiveness.
- **Care –** We treat others with compassion, dignity, and respect.

### **1.4 Commitment to Ethics**

The successful business operation and reputation of Vero RN is built upon the principles of fair dealing and high ethical conduct by our employees. Maintaining our reputation for integrity and operational excellence requires that every employee carefully observe the spirit and intent of all applicable local, state, and federal laws and regulations at all times. Vero RN will comply with all applicable laws and regulations and expects all employees to do the same.

Complying with all applicable laws and regulations is the responsibility of every employee. If a time arises where it is difficult to ascertain the proper course of action in any given situation, you should openly discuss the matter with your immediate on-site supervisor, and the Vero HR Specialist. Failure to comply with applicable laws, regulations, and the Vero RN standard of business ethics could result in disciplinary action, up to and including termination of employment.

### **1.5 Health Care Code of Ethics**

Nurses should follow the following principles during the course of performing healthcare services (while noting that other more specific rules, policies, or procedures also may apply).

- The healthcare profession, in all professional relationships, practices with the compassion and respect for the inherent dignity, worth and uniqueness of every individual, unrestricted by consideration of social or economic status, personal attributes, or the nature of health problems.
- The healthcare professional's primary commitment is the patient, whether an individual, family, group or community.
- The healthcare professional promotes, advocates for, and strives to protect the health, safety and rights of the patient.
- The healthcare professional is responsible and accountable for the individual professional practice and determines the appropriate delegation of tasks consistent with the healthcare professional's obligation to provide optimum patient care.

- The healthcare professional owes the same duties to self as to others, including the responsibility to preserve integrity and safety, to maintain competence and to continue personal growth.
- The healthcare professional participates in establishing, maintaining, and improving healthcare environments and conditions of employment conducive to the provisions of quality health care and consistent with the values of the profession through individual and collective action.
- The healthcare professional participates in the advancement of the profession through contributions to practice, education, administration, and knowledge development.
- The healthcare professional collaborates with other healthcare professionals and the public in promoting community, national, and international efforts to meet health needs.
- The profession of healthcare, as represented by associations and their members, is responsible for articulating healthcare values, for maintaining the integrity of the profession and its practice, and for shaping social policy.

### **1.6 Patient Bill of Rights**

- The patient has the right to receive respectful, compassionate, and professional care.
- The patient has the right to receive accurate and easily understood information about their health plan, health care professionals, and health care facilities. If a patient speaks another language, has a physical or mental disability, or just doesn't understand something, assistance will be provided so the patient can make informed health care decisions.
- The patient has the right to health care providers that are sufficient to provide them with access to appropriate high-quality health care.
- If the patient has severe pain, an injury, or sudden illness that convinces him/her that his/her health is in serious jeopardy, the patient has the right to receive screening and stabilization emergency services whenever and wherever needed without prior authorization or financial penalty. The patient has the right to know all the treatment options and to participate in decisions about his/her care.
- Parent, guardians, family members, or other individuals that the patient designates can represent him/her if the patient cannot make his/her own decisions, consistent with applicable law.
- The patient has the right to talk in confidence with health care workers and to have his/her health care information protected. The patient also has the right to review and copy medical records and request physicians amend their record if it is not accurate, relevant, or complete.
- The patient has the right to a fair, fast, and objective review of any complaint against the health plan, doctors, hospitals, or other health care personnel. This includes complaints about waiting times, operating hours, the conduct of health care personnel, and the adequacy of health care facilities.

## **Section 2: Employment Policies**

### **2.1 Employment-at-Will**

Vero RN adheres to the employment-at-will doctrine, which means that the employment relationship between Vero RN and its employees is at-will and can be terminated by either party at any time, with or without cause or notice. Notwithstanding this policy, however, nothing in this handbook supersedes or invalidates any separate written agreement between Vero and the employee, where such has been executed by an authorized Vero official.

Furthermore, Vero RN has the right to modify any employee's position, or impose any form of discipline it deems appropriate, at any time. Nothing in this handbook is intended to modify the at-will employment relationship that exists between Vero RN and its employees. Only a written and signed agreement from the Chief Executive Officer of Vero RN may modify the at-will relationship.

### **2.2 Personnel Files**

The Human Resources (HR) Department will maintain personnel and payroll records for every employee to ensure the accuracy and integrity of these files. Personnel files and payroll records are the property of Vero RN and may not be removed from company premises without written authorization from the Chief Executive Officer.

In order to allow Vero to keep personnel files and other employment information up-to-date, an employee must notify the Management as soon as practicable if any of the following changes for the employee: legal name; marital status; number of dependents; emergency contact name, address, or telephone number; tax exemptions; visa status; or military status.

Generally, only management personnel who have a legitimate reason to review the file are allowed to do so. Employees do not have access to information contained in other employee personnel files, except to the extent allowed by applicable law. Vero RN will CEOperate with personnel and payroll file access requests from authorized law enforcement, local, state, and federal agencies conducting official investigations, or as otherwise required by law.

Should an employment verification request be made of this company, it is Vero RN's policy to provide a current or former employee's dates of employment and position held with the organization. Compensation information will only be verified if written authorization is provided by the former or current employee.

### **2.3 Contracting Services**

All Vero RN employees hired to perform services at client sites will provide agreed upon services to the client, as directed by the client, and will be responsible for following all the rules and procedures of the individual client. Although employees are at all times employees of Vero RN, their duties, responsibilities, and work schedules will be determined by the clients. Employees are responsible for performing the aforementioned duties, responsibilities, and meeting the scheduling requirements of the client, in a manner that is deemed to be satisfactory to the client. Failure to perform one's duties in a satisfactory manner for the client will lead to disciplinary action, up to and including termination of employment.

## **2.4 Equal Employment Opportunity (EEO)**

Vero RN is committed to providing equal employment opportunities to all individuals, regardless of race, religion, creed, national origin, color, sex, gender, age, marital status, physical and/or mental disability, pregnancy status, sexual orientation, and any other classification protected by local, state, and federal laws. Vero subscribes to, and endorses, the letter and spirit of all related federal and state legislation. Vero RN prohibits unlawful discrimination against any employee concerning all aspects of employment, including but not limited to: hiring decisions, job assignment, compensation, benefits, working conditions, promotions/demotions, training, scheduling, discipline, and termination. All employees are expected to support Vero RN's commitment to EEO, and to do their part to maintain a workplace free of unlawful harassment and discrimination (as set forth further in the Anti-Harassment, Discrimination, and Retaliation policy).

## **2.5 Immigration Law Compliance**

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete an Employment Eligibility Verification Form I-9 on his/her date of hire, and present acceptable documentation establishing identity and employment eligibility within 3 business days of the date of hire. A rehired employee must also complete an updated I-9 Form if one has not been completed within the past 3 years, or if their previous I-9 Form is no longer retained or valid.

## **2.6 Credentialing**

As a health care professional, you are required by state and federal law to possess and maintain in good standing certain professional credentials. The credentials vary depending upon your professional education and license, the state in which you work, and the type of facility in which you work. Vero RN has credentialing requirements that meet and often exceed the standard set by state and federal law. Individual facilities may also impose additional requirements. It is your responsibility to understand all of the credentials required for the work assignments you accept. If you are not sure that you have the required credentials for any work assignment, it is your responsibility to find out before you report to the work assignment and report any uncertainties to the quality compliance staff. It is your responsibility to carry certain credentials with you while working in a health care facility, and produce them when required. Vero RN maintains a file with your credentials. Your credentials are reviewed periodically. It is your responsibility to send Vero RN current credentials. Vero RN will send you a checklist of required credentials prior to the start of your assignment. You must meet Vero RN minimum requirements, as well as the facility's requirements, in order to start an assignment. If you are accepted for an assignment and fail to meet the required credentials for that assignment, you may be required to complete the credentialing process before being placed for that assignment.

Always take the following information with you when you report to work at a facility:

- Driver's License (or another official photo identification)
- Nursing License
- CPR Card
- Other certifications required

## **2.7 Required Examinations and Tests**

Please note that different facilities may have different requirements.

1. Physical Exam - A physical examination may be required in accordance with the law to confirm you are capable of performing your essential job functions and free from communicable disease.
2. Drug Screen – Negative results for a drug screen are required to start any assignment. Some facilities will require additional laboratory tests prior to assignment. Vero RN will pay for and assist you with getting a drug screen prior to your assignment.
3. Background Check – A background check will be performed on all candidates prior to the start of an assignment and candidates will be required to execute the associated background check authorization form. This background check will inquire into the candidate’s relevant criminal conviction records, as well as potentially other information (such as employment history, educational background, and personal references). This background check will comply with all requirements set forth in federal or state statutes, where applicable, including the Fair Credit Reporting Act (FCRA). Vero RN reserves the right to disqualify an individual for employment based on the results of this background check. Disqualified candidates will be notified of their rights under the FCRA and given instructions on how to contest the results of the background check should they wish to do so. (Vero reserves the right to conduct subsequent background checks after an employee has been hired in accordance with applicable law.)
4. Licensure Verification – All nursing licenses will be verified. It is your responsibility to inform Vero RN of any disciplinary action against any license currently held. If you have any disciplinary actions against your license, you are required to send Vero RN official documentation regarding the license in question, and upon receipt of this documentation, Vero RN will make a final determination of your employment eligibility as a travel nurse.

This determination process will take time, and individuals will remain ineligible for employment until a final decision is made. If you live in a compact state, it is your responsibility to make sure your license is compact.

You will need to check with your state nursing board to verify your license is compact.

5. Normally Required Tests
  - a. PPD – These are facility-required tests. If the PPD is positive, you will need to provide documentation of a chest X-ray. You must also complete a TB screening questionnaire form.
  - b. Hepatitis Series – You must show proof of the dates the vaccines were administered, as well as the results of a titer to validate immunity. If you refuse to obtain the series or cannot provide documentation of a titer or a series completion, you must sign a declination statement.
  - c. Measles (Rubella), Mumps, and Rubeola – If using MMR or MR vaccination to meet this requirement, you must provide documentation of the vaccination that includes complete dates (month, date, and year) of the immunization. For anyone born after 1957, the record MUST include documentation of two injections to meet this requirement. If using titers to

meet this requirement, you must provide copies of the lab results showing a numerical reading to prove immunity. Immunity by history IS NOT ACCEPTABLE in proving immunity to Rubella (Measles) or Rubeola.

- d. Varicella (Chickenpox) – Some facilities will not accept history of disease. If using Varivax vaccination to meet this requirement, you must provide documentation of the vaccination that includes complete dates (month, date, and year) of vaccination. If using a titer to meet this requirement, you must provide a copy of the lab results showing a numerical reading to prove immunity.

## **2.8 Accommodations**

Vero RN is also committed to complying with the Americans with Disabilities Act (ADA), Pregnancy Discrimination Act, Title VII, and any other similar applicable laws and regulations. In the event an employee requires an accommodation that he or she believes is necessary in order to perform the employee's job functions, the employee must notify the Vero RN Management as soon as possible. An employee may request an accommodation for a pregnancy, a disability, a religious need, or another reason. The Vero RN Management will work with the employee regarding possible accommodations and, consistent with the law, Vero will do its best to provide the employee with a reasonable accommodation to allow the employee to perform the essential functions of his or her job, with the understanding that Vero will not be able to provide an accommodation that creates an undue hardship under applicable law.

## **2.9 Performance Appraisals**

Vero shares feedback and performance appraisals from assignments.





## **Section 3: Direct Deposit/Payroll Practices**

### **3.1 Pay Periods/Paydays**

All applicable wages are approved, signed, and clearly understood prior to the start of every assignment. All employees will be paid on Friday of each week by direct deposit. Enrollment in direct deposit is mandatory for all Vero RN employees, except where required otherwise by applicable law. If the regular payday falls on a company observed holiday, employees will be paid on the last business day before the holiday.

Employees are required to record all of their hours worked each day (including overtime) on the designated time sheet. If an employee submits an incomplete timesheet, or a timesheet is received after 12:00 pm EST on Monday, the employee may not receive payment for hours worked until the following pay date. It is the employee's responsibility to verify receipt of all timesheets submitted to Vero RN.

Employees are responsible for reviewing their pay statements for accuracy. If an employee notices a deduction or other matter in a pay statement that the employee believes is inaccurate or incorrect, the employee must notify the Management as soon as possible.

### **3.2 Payroll Deductions**

There are two types of deductions taken from your gross pay: required and voluntary deductions. Required deductions are made to comply with federal and state laws and include federal income tax withholding, state income tax withholding, social security, Medicare, and any other items required by law. You can revise your federal and state income tax withholding selections at any time by completing the proper forms, which can be obtained from the Management.

Voluntary deductions require your written authorization or agreement and are conducted in accordance with applicable law. All payroll deductions are identified on your weekly earnings statement.

## **Section 4: Benefits and Leave**

### **4.1 Workers' Compensation**

All Vero RN employees who suffer a work-related injury/disease are provided benefits in accordance with applicable workers' compensation coverage. Vero RN carries workers' compensation insurance for its employees, and any employee that suffers an injury/disease resulting from the performance of job related duties is eligible to receive compensation from the coverage, pursuant to the terms of the coverage. If an employee is injured at work, and the results of his/her post injury drug test come back positive, the employee may lose any worker's compensation benefits for that particular claim.

As set forth further below, employees are required to complete a report of injury form immediately following the injury/disease occurrence, or as soon as possible thereafter.

### **4.2 Holidays**

Vero may provide nurses with certain paid holidays. These paid holidays, and the amount of the associated payments, are set forth in each nurse's Nurse Assignment Agreement. A nurse is not entitled to holiday pay for holidays that fall outside the term of an assignment.

### **4.3 Sick Leave**

Vero provides those eligible travel nurses working in jurisdictions with paid sick leave laws with all required paid sick leave time and rights under the applicable law. Please consult your supplemental handbook addendum if you work in such a jurisdiction for additional information.

### **4.4 Jury Duty, Voting Leave, and Witness Service**

Vero believes it is important for employees to perform their civic responsibilities. When an employee is required to serve for jury duty, required to serve as a witness, or when an employee is not otherwise able to vote outside of working hours, the employee may take leave in order to perform such civic obligations. Such leave will not constitute missed time for the purposes of attendance policies or procedures.

An employee must notify his or her on-site supervisor and Vero HR as soon as possible upon learning about the potential need for such leave. In addition, an employee is responsible for returning to work as soon as possible after the need for such leave concludes. Vero reserves the right to request documentation of the need for such leave.

In addition to the above, Vero will fully follow the law with respect to jury duty, voting leave, witness service, and other similar civic obligations.

## **4.5 Military Leave**

Employees who need a leave of absence to complete military service or training, or to participate in military reserve units, should inform the Vero RN Management with as much notice as possible, and advise of the anticipated return date. Vero reserves the right to request documentation of the need for such leave and the anticipated return date.

Military leave is unpaid, except where otherwise required by law. During military leave, any available health insurance coverage will continue, provided that the required premiums are paid by the employee, until either of the following, whichever comes sooner: (a) the employee has been on covered military leave for 24 months; or (b) the employee's covered military service ends but the employee fails to return to work as required. When Vero contributed toward the employee's premium immediately before the leave began, Vero will continue doing so for up to 12 weeks of covered leave.

After the military leave concludes, the employee will have certain reinstatement rights. The employee should notify Vero as soon as possible of the date the employee desires to return to work, so that Vero may address the request. The position may not necessarily be the same job the person previously held. Vero will provide the employee with all reinstatement rights available by law.

Vero will not discriminate, harass, or retaliate against an employee or applicant for exercising any rights relating to military service or under this policy.

## **4.6 Family and Medical Leave**

### **Basic Leave Entitlement**

The Family and Medical Leave Act (FMLA) entitles eligible employees to up to 12 weeks of unpaid, job-protected leave in a 12-month period for the following reasons, as defined further by law:

- Incapacity due to pregnancy, prenatal medical care, or child birth;
- To care for the employee's child after birth, or placement for adoption or foster care;
- To care for the employee's spouse, son or daughter, or parent, who has a serious health condition; or
- For a covered serious health condition that makes the employee unable to perform the employee's job.

In addition, an eligible employee with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use his or her 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

An eligible employee also may be entitled to up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the

line of duty on active duty that may render the service member medically unfit to perform his or her duties for which the service member is undergoing medical treatment, recuperation, or therapy, is in outpatient status, or is on the temporary disability retired list.

To qualify for FMLA leave, an employee must: (1) have worked for Vero RN for at least 12 months, though it need not be consecutive; (2) worked at least 1,250 hours in the last 12 months; and (3) be employed at a work site that has 50 or more employees within 75 miles. If you have any questions about your eligibility for FMLA leave, please contact the Vero Management.

## **Benefits and Protections**

During FMLA leave, Vero will maintain the employee's applicable health coverage under any Vero "group health plan" on the same terms as if the employee had continued to work. An employee on FMLA leave must continue to pay any share of a group health plan premium that had been paid by the employee prior to FMLA leave. Upon return from FMLA leave, an employee typically will be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms, and the employee otherwise will receive all restoration rights available by law.

An employee must notify the Vero Management 30 days in advance of the need to take FMLA leave when the need is foreseeable. When 30 days' notice is not possible, the employee must notify the Management as soon as possible after learning that the employee potentially may need FMLA leave. The employee must provide sufficient information for Vero to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. In doing so, the employee must notify the Vero Management if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees also may be required to provide a certification and, to the extent permitted by law, periodic recertification supporting the need for leave.

Vero RN requires employees to use any available accrued paid leave (e.g., statutory sick pay) during any period of FMLA leave. Any other paid or unpaid leave (including any disability or workers' compensation) runs concurrently with the employee's FMLA leave. Employees may not use FMLA leave to work a second job or earn other income. An employee who violates this policy will not be entitled to the FMLA's job restoration or maintenance of health benefits provisions.

### **4.7 Non-FMLA Medical Leave of Absence**

Employees who have exhausted or are not eligible for FMLA leave, and who are unable to work due to illness, injury, or other disability, potentially may be granted a leave of absence to the extent required by law. In the event an employee believes he or she may need such leave, the employee must notify the Vero Management as soon as possible, including by notifying the Vero Management if the employee believes he or she will not be able to return to work by a previously provided return date.

Vero will address these requests on a case-by-case basis, consistent with the Accommodations policy above, and in every case will comply with all applicable laws. Vero reserves the right to require the employee to produce documentation supporting the need for such leave and providing further information about the length or nature of such leave.

Vero RN requires employees to use any available accrued paid leave (e.g., statutory sick pay) during any period of approved medical leave. Any other paid or unpaid leave (including any disability or workers'

compensation) runs concurrently with the employee's medial leave. Employees may not use leave to work a second job or earn other income.

The employee is required to advise Vero of the date the employee will be able to return to work as soon as possible.

#### **4.8 Other Employee Responsibilities for Leave**

Employees must make reasonable efforts to schedule leave for medical treatment so as not to unduly disrupt Vero's or a client's operations. When possible, an employee should schedule a medical appointment or procedure for outside working hours.

In addition to the requirements above, if an employee potentially may need leave that could affect the employee's service with a client, the employee should ensure that the client receives notice as soon as possible. The employee also should ensure that the client is as apprised as possible regarding when the employee will resume the service. The employee should CEOrdinate with Vero to determine the most appropriate way to notify the client.

In a situation where an employee's leave may affect Vero's ability to service the underlying client, Vero reserves the right to end the employee's assignment at the client site, with the understanding that Vero will comply fully with applicable law.

When an employee takes a period of leave exceeding three days, the employee must inform the Vero RN Management of the date they will be able to return to work, in writing, as soon as practicable. An employee on medical leave due to the employee's own serious health condition must, as a condition to returning to work, submit a medical authorization releasing the employee to return to his/her job. Vero reserves the right to have a physician evaluate the employee's ability to work, or to return to work.

#### **4.9 Insurance and Related Benefits**

Vero provides certain employees with forms of insurance and similar benefits. Vero will provide information about these benefits separately, and on a case-by-case basis. The terms and conditions of such benefits are set forth in the applicable plan documents. Except where the law or the plan documents require otherwise, these benefits are subject to change at any time. An employee should contact the Vero RN Management if he or she has questions about benefits.

## **Section 5: Workplace Policies and Procedures**

### **5.1 Attendance Policy**

All Vero RN employees are required to be available and work the schedules put forth by their supervisors at their client sites, as outlined in the Vero RN Nurse Assignment Agreement. If at any time an employee is not able to make it to the client site for a scheduled work shift or anticipates arriving late or needing to leave work early, he/she is required to contact his/her Vero RN Recruiter and the supervisor at the client site as soon as is reasonably possible to have the situation addressed. It is the employee's responsibility to immediately notify the Vero RN Recruiter of any reduction of hours or shift cancellation determined by his/her assigned facility due to low census. Employees must contact Vero RN before leaving the facility in the event of a shift cancellation. Nurses must agree to maintain a work schedule of not less than 36 hours per week and to work the number of hours outlined in his/her Nurse Assignment Agreement. Planned absences must be approved in advance and documented on the Nurse Assignment Agreement. All overtime must be specifically approved by the designated facility supervisor. Cancellation of the employee's assignment by the facility, as further set forth in the Nurse Assignment Agreement, will result in automatic termination of the agreement without further payment or obligation of Vero RN.

### **5.2 Permanent Placement Offers**

If at any time you are offered employment with a Vero RN client and you wish to accept the offer, there is no fee to the client as long as you have completed two consecutive thirteen-week assignments at that facility. Please notify your Vero Recruiter immediately when such an offer is made. Additionally, you agree to not accept an assignment to work at this facility through another travel nurse staffing company for at least one year beyond the signature date shown on your Nurse Assignment Agreement.

### **5.3 Floating Requirements**

Vero RN believes that all nurses share the same basic skills that should allow all licensed nurses to perform tasks such as starting IV's, inserting a Foley, administering medications, physical assessments, obtaining medical history on admissions, ambulating, helping with toileting needs, bathing, checking vital signs, etc. Should you be floated to another area outside of your regularly scheduled unit and you are not comfortable with assuming the role in that area based on the skill set required for that area, Vero RN does not expect you to function in that capacity. It is the policy of Vero RN that as a travel RN, float requirements must be discussed and written in the agreement between you and facility prior to the assignment. It is further acknowledged that the Vero RN travel professional must be oriented to the unit that they are required to float. If floated without prior knowledge call your Vero Recruiter to resolve the issue. Vero RN expects all nurses to be available to help with the basic nursing skills you are competent to perform and/or assist in taking a lighter load of patients instead of the full load required by the client.

### **5.4 Maintaining Professionalism**

As an employee of Vero RN, you are expected to adhere to high professional and ethical standards at all times. As a professional, you are obligated to follow all relevant standards for your specialty, including medical staff bylaws, facility rules, and state and federal laws that apply to you. You must maintain appropriate records, which are the property of the facility, and these records must remain on the premises of the facility. Vero RN requires you to complete all necessary chart documentation prior to ending each shift.

## **5.5 Reporting State Board Disciplinary Actions**

As soon as you are notified of any disciplinary, legal, or quality assurance proceedings (i.e. flags by licensing boards, quality assurance committees, hospitals, professional societies, Medicare or Medicaid, and malpractice claims or lawsuits) pending against you, contact Vero RN to report it. It is your responsibility as a Vero RN employee to keep us informed at all times regarding possible disciplinary actions. Vero RN will report to an employee's professional board and/or law enforcement if determined necessary after an investigation.

Procedure:

If an employee is accused or suspected of illegal or aberrant behavior, or if any type of action or proceeding above is raised by a third party, the Quality Assurance Department Management must be notified by the employee (or any other employee who witnesses the same) immediately via phone.

At the direction of the Management and / or Quality Assurance Department Management the following steps may be taken immediately:

- Employee may be sent home
- Employee may be placed on suspension until investigation is completed
- Contracted customer may be notified (if applicable)

The VP of HR and/or Chief Clinical Officer will perform a thorough investigation. After the investigation is completed the VP or HR and Chief Clinical Officer will collaboratively determine if it is appropriate to notify the employee's professional board and/or law enforcement.

## **5.6 Code of Conduct**

Vero RN expects its employees to embrace and demonstrate its core values (Section 1.3) at all times, as well as to comply with all applicable local, state, and federal laws. In the event that an employee engages in conduct in violation of these core values and/or applicable legislation, consequences will range from a verbal warning up to and including termination, at the discretion of Vero RN management (and potentially in conjunction with the client, at Vero's discretion). The following list provides **examples** of conduct that may result in disciplinary action being enacted:

1. violating any policy or procedure contained within this handbook, or any other Vero or client rule, policy, or procedure (including, but not limited to, the Anti-Harassment, Discrimination, and Retaliation policy and the Drug Free Workplace policy)
2. failing to meet established work standards
3. violating any local, state, and/or federal law
4. engaging in any unsafe practice that could endanger the safety of self and/or other employees and/or clients and patients
5. engaging in inappropriate behavior in the workplace

6. conviction of a criminal offense
7. insubordination or negligently failing to follow a supervisor's lawful instructions
8. falsification of any records or documents (including, but not limited to, any timecard, expense report, job application, or correspondence)
9. neglect of duty
10. unauthorized use of, or removal of, any property, merchandise, or money
11. tardiness and/or absenteeism
12. abusive, reckless, or otherwise irresponsible use of Company or client property or equipment
13. unauthorized use of company or client resources and/or the commitment of resources without prior managerial approval
14. excessive personal use of company or client resources
15. failure to comply with any safety or security rule, policy, or procedure, whether of Vero RN, a client, or any other party
16. failing to report an accident, injury, incident of property damage, or "near miss" as required by this handbook or other Company or client rules, policies, or procedures
17. unauthorized use or disclosure of confidential information
18. violating any agreement with Vero including, but not limited to, any confidentiality agreement or assignment agreement
19. use of profane/abusive behavior towards an employee, client, and/or vendor
20. fighting, threatening, intimidating, coercing or interfering with fellow workers or others
21. possession or control of illegal drugs, weapons, explosives, or other dangerous or unauthorized materials as described further in the No Weapons policy
22. use, sale, or possession of any gambling-related matters, or otherwise gambling, on Company or client property
23. leaving Vero or client premises during working hours without direct approval
24. sleeping on the job

This list is by no means all-inclusive and does not limit Vero RN's right to impose discipline that Vero deems appropriate for any other conduct it deems to be inappropriate. Ultimately, whether an employee receives discipline, and what level of discipline the employee receives, will be decided by Vero based on the facts of each particular situation.



## **5.7 Anti-Harassment, Discrimination, and Retaliation Policy**

Vero RN is dedicated to providing a workplace free of any form of unlawfully harassing, discriminatory, or retaliatory conduct. Vero strictly prohibits such conduct. Such conduct includes any unwelcome conduct, be it physical or verbal, on the basis of race, color, religion, gender or gender identity, national origin, age, disability, military or veteran status, genetic information, parental status, sexual orientation, other legally protected status, or due to the exercise or attempt to exercise any legally protected right.

This includes any such conduct that has the purpose or effect of unreasonably interfering with an employee's job performance or creating an intimidating, hostile, or abusive work environment. Examples of such conduct include: verbal abuse of a sexual, racial, or ethnic nature; sexual gestures; commenting about a person's body or clothing in a sexually suggestive manner; unwelcome touching of another person; degrading words used to describe a person's race, age, sex, sexual orientation, religion, ancestry, or disability; and similarly degrading objects, pictures, cartoon, magazines, emails, or computer images.

This prohibition applies to conduct by all employees, client employees or agents, vendors, applicants, independent contractors, and other third parties. This policy applies at all locations where an employee may be working, participating in activities on behalf of Vero, or otherwise representing Vero. Any employee who violates this policy will be subject to discipline, up to and including termination.

Any employee who believes that he/she has been the subject of, or who has witnessed, any form of discriminatory, harassing, or retaliatory conduct against him or herself or against another Vero RN employee **must** report the matter promptly so that Vero can address the matter. Employees have several options to choose from to report any incidences of misconduct. These options include:

1. The Vero RN Management and/or
2. Any other member of the Vero RN management team

If an employee reports such a matter through one of the above options and does not receive a satisfactory response, the employee is responsible for reporting the matter through a different one of the above options.

Investigations involving harassment will be conducted promptly, professionally, and as discreetly as possible. Vero RN will not tolerate any retaliation taken against an employee that makes a good-faith report of conduct that violates this policy, or for participating in any investigation of such conduct. All information Vero RN collects during such investigations will be kept confidential to the extent possible.

## **5.8 Drug Free Workplace**

Vero RN has a significant interest in the safety and health of its employees and is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, Vero RN strictly prohibits employees from using, possessing, being under the influence of, selling, or transferring illegal drugs (as defined below) or alcohol at any time while on company or client premises, while serving on-call, while using company or client property, or while on company or client business. Violation of this policy will result in disciplinary action up to and including termination.

For the purposes of this policy, illegal drugs include any drugs that federal, state, or local law prohibit the employee from using or possessing, as well as any prescription drugs that an employee is using unlawfully,

in a manner that does not comply with a valid prescription, or otherwise in an inappropriate matter. This policy does not, however, prohibit an employee from consuming one to two alcoholic beverages in the course of a Vero or client-sponsored social outing, so long as the employee is not on-call or otherwise performing work, and so long as the employee does not otherwise violate any Vero or client rule, policy, or procedure.

Other prohibited activity that falls under this policy includes:

- possession of paraphernalia used in connection with the use or sale of illegal drugs on company or client premises, while using company or client property, serving on-call, or serving on company or client business; and
- off-the-job possession, use, and/or sale of illegal drugs that leads to a criminal conviction, impairs an employee's ability to perform his/her job duties, places the safety of employees, clients, patients, or vendors at risk, or adversely impacts our clients' confidence in Vero RN's ability to meet its customer service needs.

All prospective employees are required to submit to a pre-employment drug screen. Results of this drug screen must be negative to become eligible for assignment with Vero RN. A positive test result will result in disqualification of a candidate for employment with Vero RN unless approval for a confirmatory retest is required by law or granted by the Vero RN Chief Executive Officer or Vice-President of Clinical Operations and is negative.

To the extent permitted by applicable law, Vero RN reserves the right to require an employee to submit a body substance sample (such as urine, breath, and/or blood) for drug and alcohol testing when, in Vero's sole discretion, there is reasonable suspicion that an employee is under the influence of an illegal drug or alcohol.

Refusal to submit to a drug and alcohol test under the terms of this policy may result in disciplinary action, up to and including termination. Employees must complete the drug and alcohol test within 24 hours of when a triggering incident occurs. Employees may be placed on administrative leave until the results of the drug and alcohol test have been received.

If the results of an employee's drug and alcohol test come back negative, he/she will be considered for reinstatement to regular status. If employee's test results come back positive, the employee will be subject to disciplinary action, up to and including termination.

If a Vero RN employee is off work for more than 30 days, they will be required to submit a drug screen before returning to work.

## **5.9 Dress Code**

All Vero RN employees are expected to present a neat and professional appearance at all times, and to adhere to all specific dress code requirements of any client site they are assigned to. For employees working at client locations, compliance with any client dress code requirement is essential to projecting the level of professionalism our clients expect. If you have not been informed of the dress code for a specific facility, please request further information.

Please adhere to the following guidelines pertaining to dress code:

- Wear clean, pressed, and neat uniforms with white, clean shoes
- Carry appropriate licenses and certifications while on duty
- Maintain standard personal hygiene standards (i.e. pulling back hair that is shoulder length or longer)
- Maintain professional appearance (i.e. using discretion in the amount of jewelry worn)

Adherence to this Dress Code Policy is an ongoing requirement of employment with Vero RN.

### **5.10 Grievance Policy**

If a situation arises that you believe could be detrimental to your employment with Vero RN, please follow the process below. (Please note that, if an employee believes he or she has experienced or witnessed discriminatory, harassing, or retaliatory conduct, the employee must follow the Anti-Harassment, Discrimination, and Retaliation policy.)

1. When a facility or a nurse has a complaint or grievance it must be submitted in writing to Vero RN Management. The incident should be phoned into the office as soon as possible.
2. The Vero RN Quality Assurance Department Management will review the facts, gather information from the parties and facilities involved and submit a written report to the Credentials Department (Director of Nursing/Clinical Nurse Supervisor).
3. The incident report will be mailed to the nurse and/or facility approximately within 48 hours.
4. The response from the nurse and/or facility is requested to be provided within 72 hours.
5. The Vero RN Chief Executive Officer, Chief Executive Officer and/or President will then review the incident and supporting documentation and if further review is needed take the necessary steps to make an informed decision concerning the outcome or disposition of the incident in conjunction with the parties responsible at the facility. This may be a written or verbal reply to the parties involved. Action will be taken at this time.
6. Any incident with a facility or nurse must be documented in writing.

### **5.11 No Weapons Policy**

Vero RN employees are expressly prohibited from having, controlling, conveying, or attempting to convey a deadly weapon or dangerous ordinance onto company and client premises, regardless of whether an employee has a valid concealed carry permit or not. For the purposes of this policy, company/client premises include all interior workspaces, company vehicles, and assigned parking lots, to the extent permitted by law. This policy also extends to the prohibition of dangerous and deadly weapons at off-site company functions and sponsored events. Vero RN's definition of dangerous and deadly weapons under this policy includes, but is not limited to:

- Handguns and other firearms

- Any device that is adapted for use as a firearm
- Explosive devices
- Incendiary devices
- Ballistic knives, switchblades, machetes, swords, stilettos, and daggers
- Metal knuckles
- Any item that is designed/produced to inflict great bodily harm
- Any weapon of mass destruction

Employees found to be in violation of this policy are subject to disciplinary action, up to and including termination.

### **5.12 Workplace Violence**

Vero RN is committed to preventing workplace violence. Employees are encouraged to report all witnessed acts and threats of violence to their onsite supervisor and member of the on-site Management, and a Vero RN HR representative as soon as possible. These threats and acts include not only employees, but also patients, clients, vendors, and any members of the public on company or client property. (When applicable, the employee should follow the procedure set forth in the Anti-Harassment, Discrimination, and Retaliation policy.)

The Vero RN HR or management team will promptly and thoroughly investigate all reports of threatened or actual violence, and the identity of an employee making a report will be kept confidential to the fullest extent possible. To uphold the integrity of an investigation, Vero RN may place an employee that is the subject of an investigation on suspension, with or without pay, pending the results of the investigation.

Any employee deemed to be found responsible for a threat or act of violence against another employee, a client, vendor, or member of the public on company property will be subject to disciplinary action, up to and including termination of employment.

### **5.13 No Fraternization**

Vero desires to avoid misunderstandings, complaints of favoritism, possible claims of sexual harassment, and morale and dissention problems that can result from certain personal relationships between employees, or between employees and individuals doing business with Vero.

Accordingly, employees are prohibited from fraternizing or becoming romantically involved with each other, or with individuals doing business with Vero (including clients, patients, and vendors), when their personal relationships create an actual conflict of interest, cause disruption, create a negative or unprofessional work environment, present problems regarding supervision, work performance, attitude, safety, security or morale, or cause other work related problems. An employee will automatically violate this policy by becoming romantically involved with subordinate or other person who reports to the employee.

If you become concerned about such a situation occurring, you should bring the circumstances to the attention of a Vero Human Resources Department immediately.

## **5.14 Electronic Devices and Information**

### **No Expectation of Privacy**

Employees should have no expectation of privacy in their use of Vero or client-provided telephones, computers, tablets, laptops, mobile devices, portable storage drives, or similar equipment (collectively, “Electronic Devices”) or any e-mail, voice mail, social media, web-based CRM or other web-based services, internet transmissions, or other electronic services (collectively, “Electronic Services”) belonging to, or provided by, Vero or a client.

Vero may access and disclose all data, messages, and other information stored on or transmitted through its Electronic Devices or Electronic Services, and clients may do the same for all information stored on or transmitted through their Electronic Devices or Electronic Services. Vero reserves the right to use or disclose such information (including, but not limited to, the contents of any e-mails, text messages, or social media) for any purpose at its sole discretion.

### **Prohibited Uses**

Employees are prohibited from using any Electronic Devices or Electronic Services (whether owned by the employee, Vero, or another party) in any manner that violates Vero or a client’s policies or procedures, or in a manner that is threatening, harassing, unlawful, discriminatory, or similarly inappropriate.

To the extent Vero or a client provides Electronic Devices or Electronic Services, employees are expected to use them for the business of Vero and its clients. Limited personal use is permitted only to the extent that it does not interfere with the employee’s job performance, consume significant resources, or violate any rule, policy, or procedure of Vero or a client.

### **Security and Protection**

Employees’ obligations with regard to confidentiality extend to any information stored on, accessed by, or transmitted by any Electronic Devices or Electronic Services. To the extent any employee uses any Electronic Devices or Electronic Services to store, access, or transmit any confidential information (as defined in this handbook and in any other Vero agreement, rule, policy, or procedure), the employee must take appropriate steps to safeguard such information including, but not limited to, by ensuring the information is password-protected, refraining from transferring such information in a manner that would violate the employee’s confidentiality obligations, keeping any Electronic Devices in a secure location, and refraining from taking any action that may intentionally or unintentionally make such information available to third parties.

Additionally, in order to ensure that confidential information is not improperly or inadvertently disclosed, employees should be cautious about taking the following actions:

- Forwarding e-mail chains or other internal communications to others.
- “CCing,” “looping in,” or otherwise copying third parties on internal communications; or

- Attaching any information about Vero billings or contracts to e-mails to outside parties or other external communications.

An employee should not take any of the above actions if doing so would cause the employee to violate any Vero agreement, rule, policy, or procedure, or if it would otherwise violate the law.

In order to comply fully with this policy, employees should be extremely diligent when they are using small screen Electronic Devices, “replying to all,” adding new people to e-mail chains, forwarding e-mails, or taking similar actions. If you are not certain how to proceed, you should seek advice from your direct supervisor and, generally, start new communications rather than forwarding or responding to prior communications.

Any employee who violates this policy will be subject to discipline, up to and including termination.

### **5.15 No Solicitation and No Distribution**

Solicitation of employees, clients and visitors in or on the properties of Vero or a client during working time (or during the working time of the Vero or client employee being solicited) is strictly prohibited. Solicitation includes any of the following (other than as instructed by Vero or a Vero client):

- Asking a person for money;
- Asking a person to fill out a questionnaire;
- Asking a person to sign a petition or membership card; or
- Asking a person to join or support a cause or organization.

In addition, employees are prohibited from distributing literature or other materials in working areas at any time, except as instructed by Vero or a client. Working areas include any areas where patients are being treated or where an employee regularly performs his or her job duties.

Moreover, visitors are strictly prohibited from soliciting any individuals or distributing literature to any individuals on Vero property. Vero will take steps to remove any third party who accesses Vero property in order to solicit or distribute literature.

Any employee who violates this policy will be subject to discipline, up to and including termination.

## **Section 6: Expenses**

### **6.1 Expense Reports**

Employees are required to submit an expense report at least once per month for incurred expenses related to Vero, with the exception of any expense covered by any per diem payment. Receipts are expected to provide for all expenses referenced in expense reports, and employees are expected to provide an explanation if receipts are not available. Employees will be reimbursed for covered expenses in accordance with Vero policy and applicable law. See Accountable Reimbursement Plan Policy.

### **6.2 Assignment-Related Housing**

If Vero is providing housing, you will be required to enter into the Housing Agreement.

If at any time you are not satisfied with your housing accommodations, we will do our best to help relocate you within two (2) weeks of a written complaint detailing the reason you are not satisfied.

You may wish to utilize the IRS tax advantage plan where you receive a tax-free stipend for your own housing.

The Vero RN housing department will provide you with the best housing options for the best costs in the location you desire. We do the research for you! You NEVER have to find the apartment, utilities, and furniture all by yourself. We strive to meet every request you present. However, due to limited housing in some areas, your options may be limited. On select assignments, your housing may be provided by the contract facility. Our housing department will go over any specific details regarding facility provided housing.

Vero RN will arrange for you to move into your apartment forty-eight hours before the start of your assignment.

Exceptions will be considered on an individual basis. Housing provided by a contract facility may involve a different move in timetable.

Prior to accepting an apartment, it is recommended that you perform a walkthrough of your assigned apartment with the apartment manager and document any damages you identify. Upon completion of your assignment and prior to your departure, perform another inspection with the apartment manager. The purpose of this is to protect you from damage liability. A move-in checklist form should be used for these inspections. We trust you will respect the property. If damage occurs, you will be held liable. It is your responsibility to acquire a copy of the rules and regulations and to follow them. Any maintenance requests should go through the housing manager.

Every housing situation may require you to bring different items. Some apartments will only include major appliances, while others will be fully furnished. The Vero RN housing department will provide you with a detailed list of what is available to you in the apartment you will be moving into. Since you often times will have the ability to choose your housing arrangements, you also have the choice to upgrade any of the products or services you rent.

It is your responsibility to pay any and all additional costs for these upgrades, unless indicated otherwise on your Nurse Assignment Agreement.

You will have forty-eight hours to vacate housing following the last day listed on your Nurse Assignment Agreement.

Some apartments require a thirty-day notice, or more, before vacating. If Vero RN has made your accommodations for your housing, then you will not be responsible for notifying your apartment manager. You must return all keys and passes to the manager. Failure to comply with vacancy policies may result in a forfeiture of some or all of your security deposit as well as your completion bonus, if applicable. It is your responsibility to pay for any charges relating to damages, missing items, or cleaning fees. These charges may be deducted from your final paycheck.





## Section 7: Health and Safety

### **7.1 Vero RN Commitment to Health and Safety**

Vero RN's greatest asset is its employees, and its long-term success depends upon their health and safety. Vero RN is committed to providing all of its employees with a work environment conducive to their health and safety needs. Safety plays an essential role in all of Vero RN's business operations, and will never be compromised under any circumstances.

Every employee must do their part to maintain a work environment that is free of potential hazards, and is encouraged to report any safety or health concerns to their direct supervisor as soon as possible. Vero RN will do its part to address and eliminate health and safety hazards in an efficient and reasonable manner. If at any time an employee reports a safety concern to Vero RN and does not feel heard, you have the right to notify The Joint Commission without any retaliation or concern of disciplinary action. The Joint Commission can be reached at 1-800-994-6610 or visit [https://www.jointcommission.org/report\\_a\\_complaint.aspx](https://www.jointcommission.org/report_a_complaint.aspx)

### **7.2 Safety Goals**

Vero's overarching safety goals, which employees are responsible for following, are as follows. Employees should note that these goals may be addressed in more detail in other Vero or client rules, policies, or procedures.

- Improve the accuracy of patient identification. Use at least two patient identifiers (neither to be the patient's room number) whenever taking blood samples or administering medications or blood products.
- Improve the effectiveness of communication among caregivers. Implement a process for taking verbal or telephone orders or critical test results that require a verification "read-back" of the complete order or test result by the person receiving the order or lab result. Standardize the abbreviations, acronyms and symbols used throughout the organization.
- Improve the safety of using high-alert medications. Remove concentrated electrolytes (including, but not limited to, potassium chloride, potassium phosphate, sodium chloride > 0.9 percent) from patient-care units. Standardize and limit the number of drug concentrations available in the organization.
- Eliminate wrong-site, wrong-patient and wrong-procedure surgery. Create and use a preoperative verification process, such as a checklist, to confirm the appropriate documents (e.g. medical records, imaging studies) are available. Implement a process to mark the surgical site and involve the patient in the marking process.
- Improve the safety of using infusion pumps. Ensure free-flow protection on all general-use and PCA intravenous infusion pumps used in the organization.
- Improve the effectiveness of clinical alarm systems. Implement regular preventive maintenance and testing of alarm systems. Assure that alarms are activated and appropriate settings and are sufficiently audible with respect to distances and competing noise within the unit.

- Reduce the risk of healthcare-acquired infections. Comply with current CDC hand-hygiene guidelines.

Manage as sentinel events all identified cases of unanticipated death or major permanent loss of function associated with a healthcare-acquired infection.

### **7.3 Reporting Injuries, Accidents, Near-Misses, and Related Matters**

If you are involved in an incident or quality-of-care issue in relation to a patient in your charge, you must call the VP of Clinical Operations or the Chief Executive Officer immediately. In addition, any employee who experiences or witnesses an injury, workplace accident, safety issue, incident of property damage that exceeds a negligible amount, or “near miss” of any of the above, must report such as soon as possible to the VP of Clinical Operations or the Chief Executive Officer of Vero RN. (If an individual needs immediate medical treatment, however, the employee should ensure that the individual receives such as soon as possible, even if that delays any other report to Vero.)

Vero shall provide appropriate forms, which employees are required to complete in the course of making such reports.

### **7.4 Safety Rules**

A safe attitude means you recognize and appreciate risks. You are aware of potential accidents before they happen and you make sure that they don't! The only person who can keep you safe everyday on the job is YOU! Vero RN associates have a duty to comply with the following requirements:

- Comply with all safety policies and procedures for any client which you learned in orientation.
- Upon arrival at your assigned facility, ask for a safety guide for that facility, including safety equipment and evacuation procedures.
- Do not use chemicals without understanding their toxic properties.
- Do not undertake a job until you have received instructions explaining the requirements for that position (or until you are otherwise certain that you understand how to perform the job safely).
- Use gait belts appropriately for ambulation and transfers. Use proper body mechanics. When lifting objects, employees should bend their knees and use the large muscles of the leg instead of the smaller muscles of the back.
- When applicable, keep bed in lowest position and use side rails. Lock wheels on hospital beds and wheelchairs prior to transfers.
- Be sure that all medical equipment in use is in good working order. Report faulty equipment to your on-site supervisor.

Do not try to correct them unless authorized by your supervisor.

- Always explain to the patient what it is you intend to do.

- FOLLOW UNIVERSAL PRECAUTIONS AT ALL TIMES. Wear proper protective equipment.
- Follow proper procedures to dispose of all hypodermic needles. NO RECAPPING OF NEEDLES.
- Use proper hand-washing techniques.
- Maintain good health and practice good personal hygiene and follow all facility policies and procedures.

## **7.5 OSHA and JCAHO**

All employees are required to complete an orientation program to meet OSHA and JCAHO requirements, which will be conducted at their assigned facility, regarding the following:

- Safety – electrical, ergonomics, fire, general safety, and hazard communication.
- Bloodborne pathogens, infection control, personal protective equipment, workplace and engineering controls, and TB.
- Age specific education pertinent to providing patient care.
- Pain assessment and management principles.

## **7.6 Bloodborne Pathogens**

OSHA guidelines require all staff to follow Universal Precautions. Hospitals are required to provide you with protective barriers to protect yourself from blood borne pathogens. Always consider any bodily fluid contaminated and protect yourself from it. Any staff member who does not follow Universal Precautions will be subject to discipline, up to and including termination.

## **7.7 Patient Abuse**

Any employee who witnesses or is involved in a situation where anyone (i.e. employee, family, or another patient) is being abused or is abusing someone else MUST notify the on-site supervisor on duty and Vero RN Management immediately. (In addition, in a situation covered by the Anti-Harassment, Discrimination, and Retaliation policy, the employee must follow the procedure set forth in that policy.)

Failure to follow this policy may result in discipline, up to and including termination. Any employee suspected of patient abuse or injury will be immediately placed on suspension pending an investigation. All allegations will be investigated and may be referred to the proper authorities for processing.

## **Section 8: Confidentiality**

### **8.1 Confidential Information**

Vero employees frequently have access to confidential information. Confidential information includes any information about Vero, its clients, prospective clients, or vendors that is not generally known outside of Vero, and which an employee learns in connection with his or her employment. Examples of confidential information include, but are not limited to, patient information; Vero's strategies, finances, and business plans; Vero's financial information including, but not limited to, annual sales forecasts, targets, and any computations of market share; sales information; customized software; marketing information; the identity of Vero's clients, prospective clients, or vendors, or other information about them (including contact information or names of decisionmakers); the terms or pricing Vero provides to clients; the terms or pricing Vero obtains from vendors; information protected by HIPAA; the names and contact information of Vero business contacts; the techniques, methods, and strategies that Vero utilizes or creates; and any information otherwise deemed confidential under any agreement with Vero (including, but not limited to, any Confidential Information Agreement). Confidential information can exist in several forms including, but not limited to, in physical documents, electronic documents, and storage media.

This policy does not in any way supersede the terms of any Confidential Information Agreement or similar agreement. This policy is not intended to, and does not, preclude employees from exercising any legal rights or complying with any legal requirements, such as lawful protected concerted activities or complying with lawful subpoenas (after bringing such subpoenas to the attention of Vero's Chief Operations Officer).

Employees must keep confidential information in strict confidence. Confidential information must not be removed from Vero or client premises unless there is written approval by Vero's Chief Executive Officer. Any employee who violates this policy will be subject to discipline, up to and including termination.