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|   | Compliance Department Policy | No. COMP-RCC 5.24 |
| | Title: CORPORATE INTEGRITY AGREEMENT COMPLIANCE | Page: 1 of 2 |
| | | Effective Date: 10-05-20 |
| | | Previous Versions Dated: |
| | | Corporate Review Dated: 09-29-20 |

I. SCOPE:

This policy applies to (1) Tenet Healthcare Corporation and its subsidiaries and affiliates (each, an “Affiliate”); (2) any other entity or organization in which Tenet Healthcare Corporation or an Affiliate owns a direct or indirect equity interest greater than 50%; and (3) any facility in which an Affiliate either manages or controls the day-to-day operations of the facility (each, a “Tenet Entity”) (collectively, “Tenet”).

II. PURPOSE:

The purpose of this policy is to ensure compliance with the terms of any Corporate Integrity Agreement to which Tenet or any Tenet Entity is a party through the implementation of reasonable and prudent controls.

III. DEFINITIONS:



“**Corporate Integrity Agreement**” or “CIA” means the document that outlines the obligations to which Tenet or a Tenet Entity agrees as part of a civil settlement with the Office of Inspector General (OIG) of the United States Department of Health and Human Services (HHS).

IV. POLICY:

Because a CIA is a final and binding agreement between providers of health care items or services and the Office of Inspector General of the Department of Health and Human Services with serious legal, reputational, and financial consequences for non-compliance, Tenet is committed to abiding by all obligations set forth in a CIA involving Tenet and/or a Tenet Entity. Specifically, Tenet’s and/or each Tenet Entity’s employees, contractors, agents, and any other party specifically referenced in the CIA, and its Board of Directors are required, during the performance of their duties, to understand and adhere to all provisions of a CIA in addition to the Tenet Code of Conduct, Tenet policies and procedures, and the Tenet Quality, Compliance and Ethics Program Charter.

IV. PROCEDURE:

- A. Tenet’s Chief Compliance Officer (or designee) shall convene a CIA Steering Committee including, but not limited to, members from the Compliance Department, Law Department and Tenet Entity leadership.
- B. The CIA Steering Committee shall develop a procedure outlining the steps that

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will be taken to comply with the specific obligations of the CIA.

V. ENFORCEMENT:

All employees whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate performance management pursuant to all applicable policies and procedures, up to and including termination. Such performance management may also include modification of compensation, including any merit or discretionary compensation awards, as allowed by applicable law.

V. REFERENCES:

- Tenet Quality, Compliance and Ethics Program Charter
- Tenet Code of Conduct