



Code of Conduct

Form CC-01 | Company Policy | Applies to all employees | Reviewed annually

This Code applies to every On Call Staffing Solutions employee: office staff, recruiters, managers, and every W-2 nurse, allied health and contract clinician on assignment, in the USA, Africa and Europe. It also applies to sub-vendors and independent contractors working on our behalf. Where a client facility's rules are stricter, follow the stricter rule.

1. Our Values

- **Patients first:** safe, competent, compassionate care in every assignment.
- **Integrity:** honest in everything we say, sign and submit.
- **Respect:** dignity for patients, coworkers, clients and candidates.
- **Accountability:** we own our work, report problems and fix them.
- **Compliance:** we follow the law, our policies and our clients' policies.

2. Patient Safety and Quality of Care

- Work only within your license, scope of practice, competencies and skills checklist.
- Refuse any assignment or task you are not trained or competent to do, and tell the charge nurse and the agency.
- Follow the facility's policies, physician orders and chain of command.
- Report abuse, neglect, exploitation or unsafe care immediately, and follow state mandatory-reporting laws.
- Never work impaired by alcohol, drugs, medication or fatigue.
- Keep professional boundaries with patients and families. No personal, romantic or financial relationships.

3. Honesty and Accurate Records

Falsification is one of the most serious violations of this Code. Never:

- Give false or altered licenses, certifications, references, health records or work history.
- Overstate your skills or experience on a skills checklist or application.
- Record time you did not work, work off the clock, or sign for someone else.
- Chart care you did not give, back-date records, or alter a medical record improperly.
- Make false statements to obtain workers' compensation, unemployment or other benefits.
- Submit inaccurate invoices, timesheets or credentialing files to a client.



4. Following the Law

All employees must follow the laws that apply to our work, including:

- Licensing laws in every state or country where you work; keep licenses and certifications current.
- HIPAA and state privacy laws.
- OSHA safety rules, including bloodborne pathogens and respiratory protection.
- Federal and state anti-kickback, self-referral and False Claims Act rules: never offer or accept anything of value for patient or business referrals.
- Equal employment opportunity, wage-and-hour, and immigration (I-9) laws.
- Anti-bribery laws (including the U.S. FCPA and UK Bribery Act) for work outside the USA.
- Tell the agency within 48 hours if your license is investigated or disciplined, or if you are excluded from any federal or state health program.

5. Privacy and Confidentiality

- Access patient information only when needed for your job; share it only as allowed by HIPAA and facility policy.
- Never photograph, record or post about patients, facilities or coworkers on social media, even without names.
- Protect agency and client confidential information: rates, contracts, client lists and candidate data.
- Never share passwords or use another person's login. Report any privacy breach within 24 hours.

6. A Respectful Workplace

- We do not tolerate discrimination or harassment based on race, color, religion, sex, pregnancy, sexual orientation, gender identity, national origin, age, disability, genetic information, veteran status or any protected status.
- Sexual harassment, bullying, threats and violence are prohibited, whether by staff, patients, visitors or clients.
- Report concerns through any channel in Section 12. You do not have to report to the person involved.
- Retaliation against anyone who reports in good faith or helps an investigation is prohibited.

7. Health and Safety

- Use required PPE and safe patient handling equipment every time. Prescription glasses are not eye protection.
- Report every injury, exposure, near miss and unsafe condition to the charge nurse and the agency the same day.
- Follow the drug- and alcohol-free workplace policy and testing rules.
- Complete all required safety training and attestations before each assignment.

8. Conflicts of Interest

Avoid situations where personal interests conflict with the agency's or a client's interests. Disclose to management in writing:

- Any offer of direct employment or work through another agency from a facility where we placed you.
- Outside jobs that overlap your scheduled shifts or create a safety (fatigue) risk.
- Ownership in, or family ties to, a client, competitor or vendor.
- Close personal relationships with someone you supervise or whose work you approve.



9. Gifts and Entertainment

- Never accept cash, gift cards, loans or valuables from patients or families.
- Gifts to or from clients and vendors must be modest (US \$50 or less), infrequent and never tied to a business decision.
- Never offer anything of value to a government official or to influence a referral or contract award.
- When unsure, ask the Compliance Officer before accepting or giving.

10. Professional Conduct on Assignment

- Arrive on time and work every scheduled shift. A no-call / no-show is a serious violation.
- Follow the facility's dress code, ID badge, phone and float rules.
- Communicate respectfully. Resolve disagreements through the chain of command, never in front of patients.
- Represent On Call Staffing Solutions professionally; you are the face of the agency.

11. Company Property and Systems

- Use agency and client equipment, systems and email for business purposes and protect them from loss or misuse.
- Agency systems may be monitored as allowed by law.
- Return all property, badges and records when an assignment or employment ends.

12. Speak Up: How to Report

If you see or suspect a violation of this Code, the law or patient safety, report it right away to any of these:

- Your recruiter or manager
- The Compliance Officer: _____ (phone / email)
- The CEO, Owodunni Sam Bada
- Anonymous reporting line or email: _____
- Outside agencies: you may also report to a licensing board, OSHA, the EEOC, the HHS Office for Civil Rights or other government agency at any time.
- Reports are kept as confidential as possible and investigated promptly. **No retaliation** for good-faith reports.

13. Investigations and Discipline

- Employees must cooperate honestly with investigations and keep them confidential.
- Violations may lead to coaching, retraining, written warning, removal from assignment or termination, and may be reported to licensing boards, clients or law enforcement where required.
- Nothing in this Code changes at-will employment or limits your rights under the National Labor Relations Act, including the right to discuss wages and working conditions.



Acknowledgment

I have received, read and understand the On Call Staffing Solutions Code of Conduct. I agree to follow it during my employment and every assignment. I know how to report concerns and that retaliation is prohibited. I will complete annual Code of Conduct training and re-acknowledge it each year.

Employee name		Employee ID	
Position		Date	
Employee signature		Agency representative	