



AMN HEALTHCARE VENDOR & SUPPLIER CODE OF CONDUCT

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MESSAGE FROM THE CEO

At AMN Healthcare, our core values aren't just something we talk about, we live them every day. We are committed to putting these values – customer focus, respect, trust, passion, continuous improvement and innovation – into practice in all aspects of our work and in all of our interactions. Living and working by our values is fundamental to our continued success. We constantly strive to do the right thing – even when it's not the easiest thing.

Our Vendors are essential to our ability to serve our clients and healthcare professionals and to support our team members. That is why we choose our Vendors carefully and seek to work with those who share our values and commitment to ethical business practices and legal compliance. Our Vendor Code of Conduct is anchored in our core values and serves as a guide for the daily decisions and actions of our Vendors.

Please read our Vendor Code thoroughly and use it as your guide when the right choice may not be clear. If you observe ethical misconduct or other questionable behavior or practices, use one of the reporting channels identified in this Vendor Code.

Thank you for putting the AMN core values into practice and for your dedication to maintaining our commitment to ethics and compliance. We are excited to work together with you to **Empower the Future of Care**.



Cary Grace

A handwritten signature in black ink that reads "Cary Grace". The signature is fluid and cursive, matching the printed name above it.

President & Chief Executive
Officer AMN Healthcare



THE VALUES WE STAND BY



Customer Focus

We put people first, whether the customer is internal or external. We strive to go above and beyond in what we bring to every professional relationship, not just meeting, but exceeding, expectations at every turn.



Respect

We value everyone's unique contribution, and as such, we treat everyone with the highest level of personal and professional courtesy, consideration, and care.



Trust

Our relationships are honest, authentic, and open. We pride ourselves on the fact that we keep our commitments. Our word is our promise.



Innovation

Innovation is a mindset. We work to stay future-focused and committed to bringing new ideas to life that generate differentiated value for everyone.



Continuous Improvement

We know that even our best efforts and our most robust solutions can always be better. We never settle for 'good enough' and constantly seek opportunities and proactively embrace chances to improve.



Passion

We love what we do – and it shows. Passion makes the difference between just doing something – and doing it well. It's the fire that drives our purpose and our daily lives.

OUR SHARED COMMITMENT

WE DO THE RIGHT THING, THE RIGHT WAY

At AMN Healthcare (“AMN”), we strive to be recognized as the most trusted, innovative, and influential force in helping healthcare organizations provide a quality patient care experience that is more human, more effective, and more achievable. We believe who we are as a company, how we manage our businesses and how we partner with our clients, healthcare professionals, team members, governments, communities, and Vendors matters and makes a difference.

We are committed to conducting business in accordance with the highest principles of ethical and professional conduct. We are guided by our [Code of Conduct](#) every day. We expect the organizations we do business with to uphold our values, operate ethically and in compliance with the law. We have established this Vendor Code of Conduct (“Vendor Code”) to express our expectations for our Vendors. For purposes of this Code, Vendor includes vendors, contractors, suppliers, partners, agents, or any company (including their employees, agents, and subcontractors) delivering products or services to, or on behalf of, AMN.

While we acknowledge that every Vendor operates independently, as a trusted partner, we expect you to adhere to this Vendor Code throughout the entirety of your relationship with AMN. Additionally, we expect you to self-monitor compliance with this Vendor Code. We may, at times audit Vendors to confirm compliance. If we become aware of a situation where a Vendor is not adhering to the expectations set out in this Vendor Code, we will work with the Vendor to review the situation and to correct the issues in a reasonable time frame. We expect all Vendors to cooperate in the review process. If the Vendor is unable or unwilling to correct the issue, we reserve the right to terminate the business relationship.

The contents of this Vendor Code are additional to and do not in any way affect or prejudice any of AMN’s rights and remedies under applicable laws or the relevant contracts with each Vendor.

**THANK YOU FOR THE
WORK YOU DO AND
YOUR COMMITMENT
TO AMN’S VALUES.**



OUR VALUES IN PRACTICE: HOW WE CONDUCT BUSINESS

WE COMPLY WITH THE LAW & ACT WITH INTEGRITY

We are committed to legal and regulatory compliance and acting with integrity. We seek to deal fairly with each other, our Vendors, clients, healthcare professionals and other stakeholders. As a trusted AMN partner, we expect the same from you. We expect you to comply with all laws and regulations affecting your business and ours. This includes, but is not limited to, the laws and regulations specifically identified in this Vendor Code.

ANTI-BRIBERY & ANTI-CORRUPTION

We expect you to do business the right way. That means never paying or accepting bribes, kickbacks, or unlawful payments, directly or indirectly, to secure any business, contract, or favorable treatment. This applies in the U.S. and other countries. You must comply with the Foreign Corrupt Practices Act (FCPA), a United States regulation that applies to all businesses regardless of where you are operating and comply with all anti-bribery and anti-corruption laws in the countries where you do business.

As part of our commitment to compliance with anti-bribery and anti-corruption laws, we may require that you participate in our due diligence process and certify your compliance with our Global Anti-Corruption Policy.

We also expect that you:

- Have clear policies that prohibit any form of bribery or corruption.
- Conduct appropriate due diligence on the parties with whom you work.
- Hold your employees and partners accountable to the expected behavior.

CONFLICTS OF INTEREST

We make business decisions in the best interest of AMN and free from the influence of conflicts of interest. This means you should avoid any action that affects, or may appear to affect, the objectivity of your decision making.

A conflict of interest occurs when an individual's interest interferes, or appears to interfere, in any way with their ability to make fair, objective decisions in the best interest of AMN. Conflicts of interest can be tricky. Though often unintentional, they can cause harm and erode the trust placed in all of us. We know they may not always be easy to spot, even if we are careful. Conflicts of interest often involve relatives and friends, personal or family financial interests, and gifts and entertainment.

In your dealings with us, we expect you to make every effort to avoid conflicts of interest. If a conflict of interest arises, or even the appearance of one, we expect you to disclose that conflict immediately, so we can work together to address, manage, and avoid it.

A BRIBE CAN TAKE THE FORM OF

- Cash or cash equivalents, like gift cards or loans
- Gifts, meals, travel, or entertainment
- A business opportunity or job offer
- Charitable or political donations
- Preferential treatment or favorable contract terms
- A favor



WHAT DOES A CONFLICT OF INTEREST LOOK LIKE?

HERE ARE SOME SITUATIONS WHICH MAY GIVE RISE TO AN ACTUAL, POTENTIAL, OR PERCEIVED CONFLICT OF INTEREST:

- A Vendor is owned, fully or in part, by an AMN team member or relative of an AMN team member.
- A Vendor employs a current AMN team member or someone with a close personal relationship to an AMN team member to perform work for AMN.
- An employee of a Vendor is supervised by or works closely with an AMN team member with whom they have a close personal relationship.
- A Vendor has access to AMN's confidential and proprietary information and uses this information to benefit themselves or a competitor.

If you have a family member working at AMN Healthcare, disclose the relationship through one of the reporting channels identified in this Vendor Code before entering a business transaction with AMN.



GIFTS AND ENTERTAINMENT

Giving or accepting modest gifts, meals and entertainment can help build business relationships. However, some gifts and entertainment can appear to be an attempt to influence a business decision. We want to avoid the appearance of anything improper. We expect our Vendors to make sure that anything given or received is nominal in value and is designed to create goodwill or strengthen the business relationship.

Our Vendors must never offer AMN team members gifts, meals, or entertainment to influence a business decision. AMN team members may not accept gifts of cash or cash equivalents, such as gift cards, from Vendors.

COMPETITION AND ANTITRUST

Our core values of customer focus, continuous improvement, and innovation, keep us focused on delivering the best products, solutions, services, and pricing for our customers. We believe in fair and open competition and that competition drives advancements.

Our Vendors are an important part of the competitive landscape. Your talents and contributions help all of us advance and grow. To continue to deliver the best solutions, services, and products to our customers, we must all comply with antitrust and fair competition laws in the countries in which we do business. We expect our Vendors to follow these laws and avoid any attempt to restrict full and fair competition, including market allocation, price fixing, or other anti-competitive conduct.

REPUTATION MANAGEMENT

We work hard to protect our reputation and are very deliberate in how we portray our business to the public. We require prior authorization for any use of our trademarks and intellectual property. Company assets may only be used in a manner approved or agreed upon by AMN and never for personal gain. We expect you to notify AMN of any negative or adverse publicity concerning your business or any product or services you provide to AMN, or any event or circumstance related to you that could reasonably be expected to cause negative or other adverse publicity concerning AMN.

Special rules apply to gifts and entertainment provided to government officials. To ensure compliance with laws and AMN's own policies, Vendors are prohibited from providing gifts, entertainment, or other business courtesies to foreign or domestic public officials or agencies on AMN's behalf without prior approval from the AMN Legal & Compliance Department at AMNLegal-DL@AMNHealthcare.com

INSIDER TRADING

Through the regular course of business with, or on behalf of, AMN you may acquire confidential information. Confidential information should be used only in support of our business relationship. We expect you to respect, protect, and maintain the confidentiality of this information. This includes never using material, non-public information about AMN or other companies obtained through your work with us, to make decisions on buying, selling, or trading AMN stock or the securities of another company. It is also illegal for you to share material, non-public information with others for purposes of their investment decisions (referred to as “tipping”).

PRIVACY AND DATA PROTECTION

Privacy and protection of confidential and sensitive data is everyone’s responsibility. You have a duty to ensure any information provided to you or to which you have access through your relationship with AMN is used only for the intended business purpose. Vendors must follow all applicable privacy laws and regulations.

We also expect that Vendors have the proper safeguards in place to protect AMN’s information. We expect Vendors to protect confidential information by adopting and maintaining processes to provide reasonable protections for personal, proprietary, and confidential information, including information you access, receive or process on behalf of AMN. You may also be required to disclose how such information is used and for what purposes. Vendors may not use, sell, or disclose this information except as expressly agreed upon with AMN.

In some circumstances, we require Vendors to complete a data security assessment and/or certification as to security measures to do business with AMN. If you have access to our systems, we may also require you to complete information security training.

WHAT IS MATERIAL INFORMATION?

Information is material if it would be considered important to a reasonable investor when determining whether to buy, hold, or sell stock or other security.

MATERIAL INFORMATION CAN INCLUDE:

- **Mergers & acquisitions**
- **Financial results before public disclosure**
- **Significant contracts**
- **Development of new products or service lines**



ACCURATE BOOKS AND RECORDS

Recording and reporting information honestly and accurately is critical to our ability to make responsible business decisions and satisfy our legal and regulatory obligations. Vendors are expected to ensure that records relating to their work with AMN do not contain any false or misleading entries. We also expect Vendors to create, maintain, and dispose of business records as required by applicable laws and regulatory requirements.

LICENSING, REGISTRATIONS, AND INSURANCE

We require our Vendors to comply with all legal and regulatory requirements applicable to their business, such as entity licensing or registrations. You may be required to provide proof of compliance. We may also audit compliance with these requirements. It is your duty to ensure required licenses and registrations are maintained in good standing with issuing authorities. It is your responsibility to proactively advise us if there is a change in your licensing or registration status that could negatively impact you, AMN, or our customers.

Many of our Vendor contracts include specific requirements to maintain certain types and values of insurance coverage. Proof of required coverage may be required at the contracting stage and at various times during the relationship. As with licensing and registration requirements, Vendors must maintain the required coverage while providing services to AMN. Vendors are also responsible to notify us immediately if there is any cancellation or reduction in coverage.

WHAT IS A "BUSINESS RECORD"?

Business Record should be broadly construed to include any recorded information related to, or that may impact, your work with AMN. Examples of Business Records include, but are not limited to:

- Financial information
- Accounting records
- Invoices and receipts
- Billing records
- Healthcare Professional Credentialing Records
- Licenses and Registrations
- Attestations

WHAT TYPES OF DATA NEED PROTECTING?

Sensitive, private, and personal information should be handled with care. The following are examples of types of data we must protect:

- Proprietary information
- Material non-public information
- Intellectual property
- Personal information
- Patient or healthcare professional information
- Confidential information received through our relationship

Notify AMN promptly in the event of a suspected, or known, data compromise or breach that may impact information related to or obtained through your relationship with us.

OUR VALUES IN PRACTICE: HOW WE SUPPORT PEOPLE

WE ARE COMMITTED TO OUR PEOPLE, OUR WORKPLACE, AND OUR COMMUNITIES

People will always be at the heart of our business. We value diversity, treat others with respect and promote human rights. We are also committed to the environment and social impact. We expect our Vendors to hold the same values and strive to accomplish the same goals.

LABOR AND HUMAN RIGHTS

We respect and promote human rights in all our relationships and in our local and global communities. We adhere to our [Human Rights Policy](#) which states our beliefs and practices. Our approach to human rights is guided by the International Labour Organization (ILO) Declaration on Fundamental Principles, the Universal Declaration of Human Rights, and the United Nations (UN) Guiding Principles on Business and Human Rights. We seek Vendors that share our commitment to respect all human rights and provide equal opportunity and protection in the workplace. We expect our Vendors to comply fully with all employment laws and have similar human rights and employment policies and practices for all workers, suppliers, and their supply chains, including migrant and temporary workers. We have a zero-tolerance policy against forced labor, child labor and human trafficking. We will not knowingly do business with any Vendor that benefits in any way from the trafficking or abusive treatment of workers.

Vendors are required to fairly compensate all their workers and wages must comply with local laws regarding minimum wage, wage payment, overtime,

and work hours. Workers must also be granted and compensated for any type of paid leave or time off to which they are entitled. We seek to work with Vendors who share our passion to ensure that all individuals are paid equitably.

We expect our Vendors to provide a safe and healthy work environment and to allow workers to exercise their legal rights of free association and collective bargaining.

Rooted in our core values of trust and respect, AMN is committed to a workplace free from all forms of unlawful discrimination and harassment and from threats of violence. We expect our Vendors to provide this same positive work environment for their team members and for everyone with whom they work in connection with AMN. We also expect our Vendors to demonstrate zero tolerance for violence, harassment, threats, intimidation, bullying, assault, or aggressive conduct, either spoken or written.

If you experience, observe, or learn of any discrimination, harassment, or other unacceptable behavior, you must promptly report it using one of the reporting options included in this Vendor Code.

WE RESPECT...

Child Labor Laws

Freedom of Employment

All People's Right to Be Who They Are

Everyone's Right to Earn the Appropriate Wage and Benefits

Freedom of Association

Everyone's Right to Clean and Livable Housing

Health and Safety

WE DO NOT...

Employ child labor or use vendors that do.

Tolerate slavery, forced labor, or human trafficking or use vendors that do.

Discriminate or tolerate any form of discrimination or harassment.

Use misleading or fraudulent recruitment practices, pay below the legal applicable minimum wage, or minimize the required legal benefits afforded in any jurisdiction.

Restrict or limit an employee's right to associate and express themselves as protected under the law.

Supply substandard housing or living conditions for our employees.

Provide dangerous, unhealthy, or risky working conditions to our employees where not associated with a specific work environment.

See our [Human Rights Policy](#) for additional guidance relating to:

- **Child Labor**
- **Forced Labor and Human Trafficking**
- **Discrimination**
- **Wages & Benefits**
- **Freedom of Association**
- **Housing & Living Conditions**
- **Health & Safety**

DIVERSITY, EQUITY AND INCLUSION

We are committed to fostering and maintaining a diverse team that reflects the communities we serve. We believe that Diversity, Equity, and Inclusion (“DEI”) are social and economic imperatives. We recognize the value of diverse Vendors and seek Vendors that will represent an expanse of voices and perspectives including small, minority owned, women owned, veteran owned, LGBTQ owned and disabled-owned businesses. We expect our Vendors to share this commitment in your operations, workforces, and within your supply chains and seek to work with Vendors who commit to the following:

- **Workforce:** Employing a workforce that reflects the diversity of the communities we serve.
- **Workplace:** Building a culture of inclusion and belonging and working to ensure equity for our workforces in opportunity and compensation.
- **Marketplace:** Prioritizing opportunity for and spend with small and diverse-owned suppliers.

We require that our small and diverse-owned Vendors complete our [Diverse Business Certification Form](#)

during the onboarding process and annually thereafter. We ask all our Vendors to maintain data and be prepared to report small and diverse supplier spend in connection with your work with AMN.

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

We are committed to and passionate about environmental stewardship. We actively manage and strive to reduce our impact on the planet, including our climate footprint, energy usage, water, and waste. You are a crucial part of our sustainability efforts.

We actively seek Vendors that share our commitment and drive efforts to reduce negative environmental impact. We encourage you to implement similar environmental efforts as appropriate for your business and to mitigate the environmental impact of your operations and strategies, including those of your suppliers. In addition to adhering to all applicable environmental laws and regulations, we expect our Vendors to be able to provide information on your impact and to manage, set goals and work to reduce your negative impact on the planet.



OUR VALUES IN PRACTICE: SPEAKING UP

WE ARE ALL RESPONSIBLE FOR DOING THE RIGHT THING

Doing the right thing means speaking up if you have an ethical or legal question or concern about this Vendor Code or your business relationship with AMN. To report questionable behavior or a potential violation of this Vendor Code, including behavior of any AMN team member, we encourage you to work with your primary AMN contact to resolve the concern. If that is not possible or appropriate, please contact AMN through any of the following methods:

- Phone: AMN's "Speak Up" reporting line at **(866) 264-5474**
- Email: **Speak-UpDL@AMNHealthcare.com**
- Mail: AMN Chief Legal Officer, 2999 Olympus Drive, Dallas, Texas 75019

We will maintain confidentiality to the extent possible and will not tolerate retaliation against anyone who has, in good faith, sought advice or reported questionable behavior or a violation of this Vendor Code. This includes reports regarding the conduct of any AMN team member.

We will thoroughly investigate any good faith reports of misconduct or violations of this Vendor Code. We expect our Vendors to cooperate in the investigation process.

We also expect our Vendors to offer ways for their team members to raise ethical issues or concerns and to prohibit all forms of retaliation against anyone who has in good faith, sought advice, or reported questionable behavior or a violation of this Vendor Code.



