



Code of Conduct

INTRODUCTION

At DaVita, our Mission is to be the Provider, Partner and Employer of choice. In order to fulfill our Mission, we have established seven written core values that we strive to live by: Service Excellence, Integrity, Team, Continuous Improvement, Accountability, Fulfillment and Fun. DaVita is committed to conducting its business activities in compliance with these values and the federal, state and local laws and regulations that apply to our business.

It is the responsibility of every DaVita teammate and DaVita subsidiary to make the right decisions when confronted with a compliance issue during the course of his or her work at DaVita. Since the proper course of action may not always be obvious, this Code of Conduct is intended to serve as a guide for reaching the right result. DaVita managers are responsible for ensuring that their direct reports understand and follow the Code of Conduct. However, when any question remains regarding the right conduct, teammates should contact the Compliance Team or the Legal Department.

All DaVita teammates have a personal stake in the success of DaVita's Compliance Program. Serious or repeated violations of regulatory or contractual obligations may undermine DaVita's credibility with government and commercial payors, associated physicians and our patients, and could put DaVita's future in jeopardy. Working together, we can demonstrate that sound regulatory policies and practices can complement DaVita's commitment to quality and integrity and provide a sound basis for successful business performance.

The following Code of Conduct summarizes the basic principles underlying DaVita's Compliance Program. This document addresses the DVA Compliance Program, Patient Care, Business Practices and Teammate Workplace Conduct. The Code of Conduct is distributed to all DaVita teammates and must be consistently followed under all circumstances. Additional information relating to these and DaVita's other Compliance Policies and Procedures can be found in DaVita's Compliance Policies and Procedures Manual, DaVita's intranet site and also will be provided through periodic training and education programs.

Please review this Code of Conduct thoroughly. This document is effective June 1 and replaces all previous Codes and Standards of Business Conduct. Teammates will be expected to know its contents and act in accordance with its principles.

DaVita communicates compliance information to DaVita teammates through Company newsletters, e-mail, payroll inserts, web page information, online training, periodic in-person training, as well as this Code of Conduct, and Company Policies and Procedures, Business Practices, and Teammate Guidelines.

Failure to comply with the Code of Conduct will result in disciplinary action and may include termination for serious offenses.

If teammates have any questions concerning the Code of Conduct or if they believe that there has been a potential violation of the Code or noncompliance with any laws, regulations, or standards governing DaVita or any situation that may appear to be improper or unethical, teammates must immediately contact their department manager, the Compliance Team or the Compliance Hotline at 888-458-5848. There will be no retaliation for asking questions or raising concerns about the Code, or for reporting possible improper conduct.

Remember, DaVita's compliance is the responsibility of each and every teammate.

Kent Thiry
Chairman &
Chief Executive Officer

Joe Mello
Chief Operating Officer

Chris Riopelle
Chief Compliance Officer

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DAVITA'S COMPLIANCE PROGRAM

DaVita's Compliance Program and Code of Conduct are tools to help the company and teammates adhere to the laws and regulations affecting our business. These laws and regulations may address Medicare and Medicaid program requirements, accreditation, access to treatment, access to medical records, confidentiality of patient information, patient's rights, fraud and abuse, certificates of need, licensure, labor laws, external reporting, and insider trading. Violations of these laws and regulations can result in severe financial penalties, exclusion from participation in government health care programs (such as Medicare) and in some cases imprisonment. DaVita's Compliance Program is designed to prevent such violations. Therefore, it is critical that all DaVita teammates comply with all Compliance Program requirements as well as all applicable laws and regulations.

DaVita's Compliance Program supports our mission to be the Provider, Partner and Employer of choice. All of the components of the Compliance Program follow the Company's commitment to uphold our Mission and Values every day, in everything we do. The program ensures Company compliance with policy standards and applicable laws and regulations and includes the following resources:

- Compliance Team and Organization
- Code of Conduct
- Compliance Policies and Procedures
- Compliance Training
- Compliance Questions
- Disclosure Program
- Auditing and Monitoring
- Compliance Hotline – **888-458-5848**

Compliance Team and Organization

DaVita's Chief Compliance Officer serves to oversee our Compliance Program and all Compliance related matters. In addition, the Compliance Committee oversees the Compliance Program and monitors its performance. The Committee is comprised of members of senior management and DaVita Inc.'s Board of Directors and is chaired by a member of the Board. The Chief Compliance Officer has a team of individuals who provide guidance and oversight of the Compliance Program and the Company's efforts to fulfill the program's goals. Compliance team member contact information is on the Compliance page of VillageWeb, the company intranet. If teammates have legal concerns teammates can find the Legal Department's contact information on their web page.

DVA Renal Healthcare, Inc. (DRH) formerly known as Gambro Healthcare, Inc. (GHc), comprises a subset of DaVita clinics. GHc entered into a Corporate Integrity Agreement with the Office of Inspector General effective December 2004. As such,

DRH has its own Compliance Committee. This committee is chaired by DRH's Compliance Officer and is comprised of members of Senior Management from key departments in DaVita Inc. The DRH Compliance Officer may be contacted with regard to any matters related to the CIA or DRH's Compliance Program.

Code of Conduct

This document is guidance for the teammates to comply with both the spirit and letter of all federal, state, and local laws and regulations that apply to the health care services that DaVita provides, as well as all laws that apply to DaVita's business dealings. Each DaVita teammate must certify that he or she has read, understands and will comply with DaVita's Code of Conduct.

Policies and Procedures

The Company has developed policies and procedures to help us achieve our mission to be the Provider, Partner and Employer of choice. Policies address topics such as patient care, compliance, business practices and teammate conduct, all of which are available on VillageWeb. Teammate care is achieved, in part, by distribution of, training on, and adherence to specific policies and procedures given to the teammates who need them. Teammates are also expected to review the Teammate Guidelines maintained by DaVita's People Services Department.

Every teammate is responsible for ensuring that he/she complies with these policies and procedures. A teammate who violates any of these policies and procedures will be subject to discipline, up to and including termination of employment.

Compliance Training

The DaVita Compliance Training Program consists of various online training courses that are focused on the overall and general teammate population as well as on specific and focused teammate positions. Here is a brief description of those various programs.

- **General Training** – developed for all audiences and teammates and to be completed annually.
- **Specialized Training** – developed for individuals in certain specialized areas of the Company such as IT, People Services, and Billing, as well as for individuals responsible for negotiating contracts. In addition, Compliance training programs have been created for RODs, Medical Directors and the attending physicians.

The importance of training is to keep everyone apprised of updates and the job requirements for each teammate in their applicable areas of responsibilities. It will make all teammates strong proponents of our Compliance Program.

Compliance Questions

The laws applicable to DaVita's operations are numerous and complicated. When a teammate is not sure whether a particular activity or practice violates the law or the Compliance Policies and Procedures, the teammate should not, under any circumstance "guess" the correct answer. Instead, the teammate must immediately seek guidance from his or her department manager or the Compliance Department. DaVita teammates will not be penalized for asking compliance-related questions. Indeed, DaVita is intent on maintaining a culture in which every teammate is comfortable asking the questions necessary to ensure that he or she understands the duties imposed on him or her by this Code of Conduct, DaVita's Compliance Policies and Procedures and other applicable federal and state laws.

Questions may be directed to any Compliance Team Member, contact information is available on the Compliance webpage on VillageWeb or call the Compliance Hotline at 888-458-5848.

Compliance Hotline (888-458-5848)

DaVita supports an open door policy encouraging all teammates to address concerns or questions with their supervisor or any member of DaVita's management team. If a teammate is uncomfortable speaking with someone within the Company, or if a teammate wants to ask a question or report a suspected violation anonymously, call the Compliance Hotline. The Compliance Hotline is available seven days a week, 24 hours a day.

Types of matters to be discussed on the Hotline include, but are not limited to: anti-trust laws, fraudulent transactions, conflicts of interest, and violations of this Code of Conduct. This is not an inclusive listing, but provided to give teammates some guidance. Please remember the People Services Team has its own number: 800-381-7063.

Reporting Suspected Violations

Teammates have an obligation to report suspected violations of law, this Code of Conduct or Company Policies and Procedures. Reporting allows DaVita to investigate and take any necessary corrective action. Remaining silent about a violation of law or policy by a teammate (i.e., not self-reporting) or someone else puts the Company and a teammate's job in jeopardy. A teammate should report such violations or suspected violations to their supervisor, another member of management, any member of the Compliance Team, or the Compliance Hotline.

DaVita shall strive to maintain the confidentiality of any reporting teammate. It must be understood, however, that there may come a point at which a reporting teammate's identity may become known or may have to be revealed (e.g., if government

authorities become involved in the investigation). Finally, whether or not the identity of a reporting teammate becomes known or revealed, under no circumstances will DaVita take adverse action against a DaVita teammate who reports actual or potential misconduct in good faith and who was not involved in the misconduct in question.

Investigations and Response Process

When a credible allegation of misconduct or a potential violation is reported, the applicable member of the Compliance Team will conduct a preliminary investigation under the supervision of a Company attorney, and will determine what additional action, if any, is necessary. The investigation and analysis will determine whether there is an issue to be considered “material” or whether the matter being reviewed shall be considered “non-material.” Not all investigations may result in the findings of either a material or non-material issue. All reviews will be conducted impartially and without any predetermined conclusions.

If a teammate is under investigation, he/she may be removed from current work activity, if appropriate, until the investigation has been completed. If disciplinary action is warranted, the action will be imposed promptly.

If it is determined that a material violation has occurred, steps to rectify the violation will take place, including reporting it to the applicable government or regulatory agency and if appropriate, DaVita will make any necessary repayments.

Non-Retaliation

DaVita prohibits retaliation against a teammate who, in good faith, sought help or filed a report. Anyone who retaliates against such an individual will be subject to appropriate disciplinary action, including potential termination of employment. If a teammate believes that he/she is the subject of retaliation for reporting an actual or suspected violation of law or Company policies, they should report the retaliation to a senior manager, a Company attorney, a member of the Compliance Team, the Compliance Hotline, or a People Services Teammate.

Monitoring, Auditing, and Investigations

DaVita has an auditing and monitoring program that includes an assessment and overview of diverse business activities throughout the company. Self audits, focused reviews, feedback from the Compliance Hotline and concerned teammates, and outside consultants are used to assess compliance risk. The Compliance Team conducts proactive audits to monitor compliance with various billing rules and regulations and Company Policy. Additionally, investigations of allegations of non-compliance with related laws, regulations or Company compliance-related policies may be conducted by teammates in Auditing & Monitoring. The Compliance Team also works with legal counsel to determine if any disclosure or repayment obligations once an investigation takes place.

Voluntary Disclosure

It is DaVita's policy to voluntarily report fraudulent conduct it uncovers that affects any federal or state health care program.

Violations of Compliance Program

DaVita will take disciplinary action against any teammate who fails to act in accordance with this Code of Conduct, DaVita's Compliance Program, DaVita's Compliance Policies and Procedures and applicable federal and state laws.

Disciplinary action may range from a verbal warning to termination of employment, and the severity of discipline will be determined by members of senior management, including the Chief Compliance Officer (and the teammate's department manager, as appropriate) after consideration of a number of factors, including but not limited to:

- The nature and severity of the violation;
- The effect of the violation on DaVita and its patients;
- Whether the violation was committed intentionally, recklessly, negligently or accidentally;
- Whether the teammate has committed any prior violations;
- The discipline imposed for similar past violations;
- Whether the teammate was directly involved in the violation;
- Whether the teammate self-reported his or her misconduct; and
- Whether (and the extent to which) the teammate cooperated with DaVita in connection with investigation of the misconduct.

Where appropriate, DaVita may also take disciplinary action against department managers who failed to detect or report misconduct on the part of teammates under their supervision. DaVita shall document any disciplinary action taken for violation of this Code of Conduct, DaVita's Compliance Policies and Procedures and other applicable federal and state laws, as well as the reason for such disciplinary action.

PATIENT CARE

In order to be the Provider of Choice, DaVita must ensure that our patients receive quality care delivered in a considerate, respectful, and cost-effective manner. DaVita teammates must, at all times, treat all patients with care, concern, dignity and respect. Patients are entitled to prompt and courteous responses to their requests and to their needs for treatment and services, consistent with DaVita's capacity, our mission, and applicable laws.

DaVita teammates must never make distinctions in the admission, transfer, or discharge of a patient, or in the care DaVita provides, on the basis of race, gender, age, religion, national origin, disability, color, marital status, veteran status, medical condition, or other protected-class status.

DaVita teammates must provide patients, upon admission, with a statement of their rights and obligations. Patients must be informed of their right to self-determination. This right refers to the ability of competent adults to participate in and make their own health care decisions after receiving from their physician a complete disclosure of their diagnosis, prognosis, and treatment alternatives. A patient has the right to accept medical care or to refuse treatment to the extent permitted by law, as well as the right to be informed of the medical consequences of such refusal.

DaVita must involve patients in all aspects of their care and obtain informed consent for treatment. DaVita must provide each patient with a clear explanation of their care, including their treatment plans, and an explanation of the risks and benefits associated with various treatment options. Patients have the right to request a transfer to a different DaVita center or another center of their choice.

If a patient has been declared incompetent by a court, is found by his or her physician to be medically incapable of understanding the proposed treatment, is unable to communicate his or her views regarding treatment, or is a minor, then it is the right of the patient's guardian, next of kin, or other legally authorized responsible representative to exercise, to the extent permitted by law, the patient's rights.

All DaVita patients must be informed about DaVita's grievance procedure and how complaints can be filed. All patients have the right to have their grievances handled promptly, courteously, and in a professional manner. Any action by a teammate against a patient because that patient has filed a grievance is prohibited.

Quality of Care

DaVita is committed to providing quality care to all patients. Quality care and the services provided must be based on patient medical needs and physician's medical judgment and orders.

DaVita shall provide services, including laboratory testing, which are appropriate, safe, and in compliance with applicable laws, regulations and professional standards. Patient care must be guided by the intended outcome of the patient's treatment plan in accordance with established clinical standards and protocols. Sound judgment, focused on the best interest of the patient, must be applied at all times.

Only individuals with appropriate professional credentials, and who are properly trained, shall be permitted to provide patient care services. Medical staff members at DaVita dialysis centers are required to adhere to the policies, procedures and standards set forth by federal, state and local regulations and DaVita policies regarding the quality of clinical care.

DaVita shall periodically review patient care policies, procedures and clinical protocols to ensure that they meet or exceed current standards of practice.

Privacy of Patient Information

DaVita must treat patients in a manner that preserves their dignity, autonomy, self-esteem, and civil rights. DaVita must protect patients' right to privacy and preserve the confidentiality of our patients' medical records, as set forth in this Code of Conduct.

As part of DaVita's business, the Company receives medical and other sensitive information about patients and potential patients. DaVita respects and preserves the privacy of this personal information. Except to the extent permitted by the patient, DaVita's Privacy Policies and other applicable federal and state law, DaVita teammates must not disclose information about a patient to anyone other than a DaVita teammate or clinician involved in the patient's care on a need-to-know basis. DaVita must preserve the confidentiality of patient information that remains in its possession.

When a teammate of DaVita is uncertain whether the release of information might violate patient confidentiality, he or she should ask his or her department manager, the Chief Privacy Officer, the Chief Compliance Officer, any member of the Compliance Team, or call the Compliance Hotline at 888-458-5848 and obtain clarification before using or disclosing the patient information.

DaVita may refer a violation of its Patient Privacy policy to applicable law enforcement agencies.

BUSINESS PRACTICES

Fraud and Abuse

DaVita is committed to operating with honesty and integrity. Therefore, DaVita teammates must ensure that all statements, submissions and other communications with customers, prospective customers, the government, suppliers and other third parties are truthful, accurate and complete. Teammates must never make false or misleading statements in the course of their business dealings.

The government imposes severe penalties on those who make false statements and submit false claims. Such statements or claims can result in criminal prosecution, imprisonment, and significant fines. Prohibited practices include, but are not limited to:

- Billing for supplies or services not delivered;
- Misrepresenting services actually rendered;
- Falsely certifying that services were medically reasonable and necessary;
- Seeking to collect amounts exceeding the co-payment and deductible from a Medicare or Medicaid beneficiary who has assigned his or her benefits to DaVita;
- Soliciting, offering, receiving, or paying a kickback, bribe, rebate, or any other remuneration in exchange for patient referrals; and
- Unlawfully inducing patients.

When a DaVita teammate discovers an error in a bill or claim that has been submitted to a payor, that teammate must immediately notify his or her department manager, a Compliance Teammate or the Chief Compliance Officer.

The Company will notify the payor of any overpayments received as a result of billing errors by DaVita, or processing errors by the payor and shall repay any monies owed in a timely fashion after confirming the overpayment.

Referral Sources

DaVita and its teammates must never offer, pay, solicit, or receive any money, gift, services, or other remuneration in return either for the referral of patients or to induce the referral of patients.

Examples of prohibited conduct include, but are not limited to, the following:

- Payment of any money in exchange for a patient referral;
- Payment of an incentive bonus for the referral of a patient;
- Providing free or discounted billing, nursing, or other services to referral sources;

- Leasing space or providing other tangible property at below fair market value to referral sources; or
- Paying in excess of fair market value for items or services from referral sources.

In addition, DaVita teammates must avoid even the appearance of inappropriate conduct. Whenever DaVita teammates entertain or provide gifts to physicians or others in a position to refer patients, teammates must act in accordance with this Code of Conduct's Gift and Entertainment section, Company Policies and Procedures and applicable federal, state and local laws.

When a DaVita teammate is uncertain whether a particular action might violate this Code of Conduct, the teammate should immediately seek guidance from his or her department manager, a Compliance team member or the Chief Compliance Officer.

Kickbacks – Gifts, Favors

DaVita will not pay or accept any bribe, gratuity, kickback, or similar payment to anyone, including physicians, contractors, agents, patients, or agents of customers or members of agents' families, in connection with any DaVita services or products. DaVita shall not participate in business ventures that can only be obtained by improper or illegal procedures.

All DaVita teammates and physicians are strictly prohibited from accepting gifts, favors, payments, services, or anything else of value that might appear to influence the actions of a physician or of a DaVita teammate.

Teammates and physicians may retain gifts of nominal value, such as pens, coffee mugs, and other similar novelties, but must refuse any gift of more than a nominal value and must report any inappropriate offers to the Chief Compliance Officer.

Teammates and physicians are strictly prohibited from soliciting or accepting anything of value in exchange for patient referrals or in exchange for purchasing or leasing any item or service, which may be reimbursed, by Medicare, Medicaid, or any federal or state health care program. DaVita pays fair market value for medical director services.

Record Creation, Use and Maintenance

Accuracy of Records

Every teammate is responsible for the integrity and accuracy of the Company's documents, records and e-mails including, but not limited to, patient medical records, billing records, and financial records. No information in any record or document should ever be falsified or altered.

Financial Records

DaVita's books and records must accurately, honestly, and completely reflect the true nature and purpose of transactions to which DaVita and its affiliates are, or have been, a party. All transactions, events, commitments, arrangements, correspondence, other communications or changes in circumstances that could affect DaVita's financial records must be disclosed to appropriate personnel. Undisclosed, unrecorded, or "off the books" funds, assets, or transactions are prohibited.

All teammates involved in the accounting and financial reporting functions must also adhere to the Corporate Governance Code of Ethics. These teammates are expected to attest annually to their responsibility for compliance with this Corporate Governance Code of Ethics. A copy of the Corporate Governance Code of Ethics can be found on the Company's external website.

Document Retention

DaVita is committed to maintaining thorough and accurate records in compliance with sound business practices and all federal and state laws. To this end, all documents must be maintained and destroyed in accordance with DaVita's Document Retention and Destruction guidelines.

Excluded Individuals

DaVita shall not employ or retain anyone who is excluded from any federal or state funded programs. To that end, DaVita has implemented screening procedures to identify such individuals. DaVita's policies and procedures are intended to ensure that the Company does not contract with, employ or bill for services ordered, rendered or supervised by an individual or entity that is excluded, suspended, debarred, or ineligible to participate in federal health care programs or has been convicted of a criminal offense related to the provision of health care items or services and has not been reinstated in a federal health care program.

If a teammate becomes aware that he or she or any other teammate is officially excluded or proposed for exclusion from any government health care program, that teammate must notify the Compliance Team or the Chief Compliance Officer immediately so that appropriate action can be taken.

Licensure and Certification

DaVita is committed to ensuring that only qualified health professionals treat DaVita patients. Practitioners treating DaVita patients must abide by all applicable licensing, credentialing, and certification requirements.

Fair Dealing

All DaVita teammates must deal fairly with DaVita's customers, suppliers, competitors and teammates. No teammate, officer or director shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

DaVita teammates, agents and consultants are expected to strictly adhere to the requirements of the Economic Espionage Act of 1996. We must avoid acquiring, possessing or using any competitor's trade secrets except as permitted by an agreement between DaVita and the competitor with respect to those specific trade secrets.

Antitrust

Antitrust laws and unfair competition laws protect DaVita and other companies from unfair trade practices and promote fair competition. These laws are based on the belief that individuals and businesses acting independently serve the economic good of all.

All teammates must strictly comply with the letter and spirit of all antitrust laws of the United States and of the individual states in which the Company does business. No officer, teammate or agent of DaVita or any of its affiliates has any authority to engage in conduct that does not comply with this standard of conduct or to authorize, direct, approve or condone such conduct by any other person.

DaVita teammates faced with situations that appear to be questionable under antitrust and trade regulation laws should consult with their supervisor for guidance. Any questions about interpretations of antitrust and trade regulation laws should be discussed with the Legal Department.

A DaVita teammate who suspects that a violation of antitrust and trade regulation laws has occurred should disclose that situation to the Compliance Team, the Chief Compliance Officer or General Counsel.

Contracts and Contract Negotiations

It is DaVita policy to have all commercial transactions evidenced by full and complete written agreements. Teammates are to conduct business according to DaVita policies that dictate what Company officials are authorized to negotiate and execute commercial transaction agreements. All substantial contracts or forms to be used for substantial contracts must be reviewed by the Compliance and Legal Departments prior to signing. Any significant deviation from an approved form also must be reviewed by the Compliance and/or Legal Departments prior to signing.

Vendor Relations

A vendor is any group, organization, or individual(s) who is currently providing, or desires to provide, goods or services to DaVita.

Certain types of support from vendors are appropriate and consistent with DaVita's Conflict of Interest policy and applicable government limitations. However, other types of support from vendors may be found to violate applicable laws and/or to present unacceptable conflicts of interest.

Teammates and their family members may not accept any discount on personal purchases that may appear to be offered because of a vendor's relationship with DaVita, unless the same discount is approved of by management and made available to all DaVita teammates.

DaVita has developed detailed policies to guide teammates in their relationships with vendors. All teammates are required to familiarize themselves with DaVita policies and procedures regarding vendor relationships and adhere strictly to those policies and procedures.

Any teammate who has questions regarding the application of these policies and procedures to a particular situation must obtain clarification from their supervisor or the Compliance Team before accepting support from a vendor.

Gratuities and Government Employees

DaVita's policy is to avoid even the appearance of an improper action and prohibits giving gifts to government employees. Payment for meals of government teammates is not generally permitted although light refreshments, such as a box lunch, may be provided at business meetings held at a Company office. If teammates deal with a government employee, they are responsible for knowing these limitations. The teammate should inquire if they are not certain.

Confidentiality

Confidential Patient Records

DaVita recognizes the importance of protecting the confidentiality and privacy of its patients in accordance with state and federal laws. DaVita has incorporated these privacy and confidentiality requirements into its policies and procedures to ensure that patient information is kept private and confidential. The Federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule outlines DaVita's responsibilities with regard to patient health information as well as the rights patients have concerning their own health information.

Every teammate must treat all patient information or any medical records and charts, including any documents or records that contain patient-identifying information (such as the names of patients, social security numbers, account numbers, home addresses, telephone numbers, medical histories, treatment histories, and insurance information), as confidential. DaVita is committed to protecting confidential patient information. Teammates must use and disclose patient information only in a manner consistent with DaVita's privacy policies and procedures. If a teammate is uncertain about disclosing patient information, they may contact the Compliance Department's Privacy Officer.

Business Information

In the performance of their duties, teammates may have access to, receive or be entrusted with confidential and/or proprietary information, that is owned by DaVita (or its affiliates, agents, or consultants), and that is not presently available to the public.

Examples of confidential business information include:

- earnings estimates;
- expansions or curtailment of operations;
- an increase or decline in business;
- a merger or acquisition proposal or agreement;
- borrowings;
- securities offerings;
- stock repurchase plans;
- potential or threatened litigation;
- litigation strategy;
- unusual management developments;
- purchases or sales of substantial assets;
- business plans;
- development plans;
- marketing strategies;
- organizational plans;
- financial management;
- training materials;
- fee schedules;
- departmental performance metrics; and
- administrative policies.

Teammates must not disclose internally or externally, either directly or indirectly, confidential information except on a need-to-know basis and in the performance of their duties on behalf of DaVita. Teammates must never disclose confidential information externally unless expressly directed to do so by legal counsel. Upon termination of employment with DaVita, a teammate must promptly return all confidential information in his/her possession to DaVita.

Government Investigations

DaVita is committed to appropriately responding to, and not interfering with, any lawful government inquiry, audit or investigation.

DaVita must be forthright in its dealings with government officials who are responsible for administering and enforcing the law. Teammates must comply with all requests for information completely, accurately, and factually, as directed by counsel. Teammates must cooperate with all inspectors and surveyors, as also directed by counsel. Teammates must never conceal, destroy, or alter any documents, lie, make misleading statements, or omit material facts to a government official. DaVita and its teammates must never attempt to cause a teammate to provide false, misleading, or incomplete information, or obstruct, mislead, or delay providing requested information.

In the event a search warrant is served on any teammate, center or business office, DaVita will fully comply with the warrant and cooperate with agents serving the warrant. Teammates will remain courteous and professional when dealing with agents executing a search warrant.

Teammates will not interfere with the lawful execution of a search warrant. Obstruction of the agents' investigation is a felony under federal law.

If government agents come to a DaVita facility with a search warrant, ask (each of) them for a business card and to be seated in the waiting area. Immediately contact DaVita's Chief Compliance Officer or DaVita's General Counsel. Do not submit to questioning or an interview. Do not volunteer documents or other information unless advised by Legal/Compliance.

DaVita has developed a detailed policy that outlines the procedures to follow if and when government representatives arrive unannounced at a DaVita center or at the homes of DaVita teammates. DaVita's Search Warrant Policy establishes this procedure so that DaVita's response to the government is orderly and protects its patients' interests while fully cooperating with the government. Please review the policy in the Compliance Policy and Procedure manual.

Marketing, Advertising and Promotion of DaVita Products and Services

DaVita will practice honest, straightforward, informative and non-deceptive marketing techniques. DaVita works in collaboration and coordination with the patient's physician in an understanding of the services offered by DaVita, the services that will be provided when procedures or items are ordered, and the payor requirements for the procedures or items ordered. Where medical literature is produced, collaboration by DaVita and physicians takes place as appropriate. Every piece of literature produced by DaVita will contain a clear indication that it is not produced to influence physician ordering patterns. Marketing, as well as

technical/scientific information distributed by DaVita, shall be reviewed and approved by those qualified to assure substantiation of all claims made and shall include sign-off by appropriate senior management. An example of each piece will be archived with its signature page and reference to any validation/verification reports or documents.

All DaVita advertising must be truthful and the advertising must not contain any misrepresentations. DaVita will comply with all special government provisions regarding the advertisement of health care products or items.

Research

All clinical research activities performed within DaVita centers are to be coordinated or approved by DaVita Clinical Research (DCR). All clinical research activities shall follow appropriate rules and regulations.

A teammate engaged in any research project must act with high ethical standards. A teammate must follow the research study protocol without deviation from the protocol. All research activities must be appropriately documented. A teammate must never engage in academic or scientific misconduct, such as fabricating, falsifying or changing results or copying the results from other studies without performing the research.

All patients asked to participate in a research project must be given a full explanation of the project, as well as informed of their right not to participate. Patients must be fully informed of the risks, benefits, and alternatives concerning the project. Patients must be fully informed of the procedures to be followed and any potential discomfort. DaVita must request and maintain all appropriate patient consent documentation.

Appropriate billing practices must be adhered to as defined by the government or commercial insurance programs.

Intellectual Property

DaVita teammates must not use any material subject to a patent, trademark or copyright without permission from the owner of such patent, trademark or copyright. Materials subject to a patent, trademark or copyright held by DaVita must only be used for legitimate and authorized business purposes.

If a teammate has questions regarding the use of intellectual property, he or she should immediately seek guidance from his or her department manager, the Legal Department, a Compliance Teammate, or the Chief Compliance Officer.

Political Contributions

DaVita must comply with all federal, state, and local laws governing political activities. In particular, federal law prohibits a corporation from making contributions or expenditures in connection with a federal election. This prohibition is broadly construed to include in-kind contributions, such as the use of corporate centers or any other donation of goods and services, for which fair market value compensation is not obtained. Teammates must not engage in individual election-related activities in the workplace.

No teammate may request reimbursement and no reimbursement will be made, on expense accounts or otherwise for any political contributions.

A contribution of DaVita funds to state or local campaigns may only be authorized by the Chairman of the Board, Vice President of Government Relations and Chief Executive Officer, and only if such contribution complies with all applicable laws.

From time to time, DaVita may invite teammates and patients to make personal contact with government officials or to write letters voluntarily expressing their concerns or their position on a particular issue. In addition, some teammates regularly have contact with government officials. In these situations, teammates must comply with all applicable laws and regulations. If a teammate has any questions about contacting a government official, he or she should contact the Legal Department and/or the Vice President of Government Relations.

Charitable Contributions

DaVita may contribute to charitable organizations provided that DaVita's contribution is not, and cannot be seen as, an attempt to induce referrals. Except for Company-sponsored events, teammates may not solicit each other for charitable contributions. All solicitations for Company-sponsored events should occur away from the treatment floor.

Employment

DaVita is committed to fair and lawful policies and practices in hiring, compensation, career development, discipline, and other employment actions.

DaVita will not permit discrimination in hiring or in the workplace based on race, color, religion, gender, national origin, age, marital status, citizenship, disability, sexual orientation, veteran status, or any other unlawful consideration.

WORKPLACE /TEAMMATE CONDUCT

Conflicts of Interest

At all times DaVita teammates must seek to promote, enhance, and protect the interests of DaVita and its patients and must avoid taking any action that may be adverse to those interests. DaVita's reputation depends not only on the Company's conduct, but also on the appearance of the Company's actions to those with whom the Company interacts.

A conflict of interest occurs if personal interests or outside activities influence, may influence, or appear to influence a teammate's ability to make objective decisions. A conflict of interest may also exist if the demands of any outside interest hinders a teammate's ability to perform his or her job or causes a teammate to use DaVita resources for non-Company-related purposes.

Teammates' loyalty to DaVita must supersede any relationship with a client, competitor, contracted party or supplier. When a DaVita teammate is uncertain about the propriety of his or her conduct or a personal or business relationship, the teammate should immediately seek guidance from his or her department manager, any member of the Compliance Team, or the Chief Compliance Officer.

All teammates must ensure that they remain free from actual or perceived conflicts of interest. The following sections deal with some situations that may occur.

Business Relationships with Patients

Teammates must avoid conducting any business transactions or entering into any business relationships with patients, including the purchase or sale of personal items. Teammates must not provide any economic incentive to a patient in order to induce that patient to receive treatment at DaVita or to continue to receive treatment at DaVita. Criminal and civil penalties may be imposed on both the offeror and recipient of an inappropriate financial or business opportunity.

Business Relationships with Physicians

DaVita is committed to maintaining strong and positive working relationships with affiliated physicians.

DaVita must not enter into any financial or business relationships with physicians or family members of physicians that could be construed as a violation of the Anti-Kickback statute, the Stark Laws (relating to physician self-referral) or any other relevant federal or state law.

Gifts and Entertainment

A DaVita teammate may not give or receive personal gifts or entertainment to or from health care providers, patients or other persons or companies doing business with DaVita, except as provided for in this Code of Conduct and DaVita's Teammate Gift Policy in the Compliance Policies and Procedures Manual. Gifts or entertainment could be considered an improper inducement for the referral or purchase of health care items or services under federal and many state laws. Criminal and civil penalties may be imposed on both the offeror and recipient of an improper inducement. The purpose of these laws is to prevent consideration of personal benefit by a physician or medical provider from overriding considerations of quality or patient well-being and sound medical judgment.

Legal and Company restrictions focus on gifts or entertainment that are intended to, or that give the appearance of attempting to, compromise the objectivity of health care decisions (e.g., weekend trips, elaborate dinners, or similar benefits). More modest expressions of goodwill, which are consistent with industry and local business practices, are acceptable (e.g., holiday gift baskets, modest lunches or dinners where business is discussed). Where modest gifts or entertainment are appropriate, good judgment should be followed. All gifts and entertainment should fall within the bounds of moderation and common business courtesy and have a valid business purpose (e.g., a business lunch).

A pattern of giving or receiving gifts is prohibited if the frequency or total value of the gifts exceeds reasonable limits. As a guideline, gifts to and from patients should not exceed \$10 per person, per event and the aggregate value of gifts should not exceed \$50 per person, per year. Gifts to and from non-patients should not exceed \$100 per person, per event and the aggregate value of gifts should not exceed \$300 per person, per year. The reason for this policy is that the acceptance of a gift may create the appearance of a conflict of interest. Other patients may believe that the teammate will give preferential treatment to those patients who have given that teammate a gift. Moreover, patients who cannot afford to give a gift may become self-conscious or embarrassed about the fact that they are unable to provide gifts. If a patient wants to give a gift, the patient must be advised that the gift should either be one that can be shared by the entire center or be a gift made to a charity in the center's name or Patient Emergency Fund.

Protection and Proper Use of Company Assets

All DaVita teammates must protect the Company's assets and ensure their authorized and efficient use. Theft, carelessness and waste have a direct impact on DaVita's profitability. All of DaVita assets must be used solely for legitimate business purposes.

Computer and Electronic Media Access and Use

Teammates are expected to use Company computers, e-mail and internet systems appropriately. A detailed computer, internet and e-mail usage policy is set forth in the Teammate Guidelines. A teammate who violates the computer, internet and e-mail usage policy shall be subject to discipline, up to and including termination.

Outside Employment and Other Activities

Teammates must not engage in outside activities or outside employment during working hours and must not use DaVita equipment, supplies, or information in connection with outside activities or employment.

Travel and Business-Related Expenses

Teammates must promptly record business expenses completely and accurately on expense reports in accordance with all DaVita Policies and Procedures. Entertainment, meals and travel expenses that are reported on expense reports must have a business purpose and not be lavish or extravagant. All such business-related expenses must comply with DaVita's Accounts Payable Department's Travel Expense Policy.

Insider Trading

From time to time, teammates may receive or become aware of material, non-public information regarding DaVita and/or other companies that may be of significance to the securities markets. Material information is any information that an investor would consider important in a decision to buy, hold, or sell a security. Federal law prohibits DaVita teammates from using material non-public information for personal gain or communicating with external parties about such information.

Under no circumstance may any teammate use material non-public information with respect to DaVita or any other company for his or her benefit, or trade in any securities relating to such information.

Corporate Opportunities

All DaVita teammates are prohibited from (a) taking for themselves personally opportunities that are discovered through the use of DaVita property, information or position; (b) using DaVita property, information, or position for personal gain; and (c) competing with DaVita. Teammates, officers and directors owe a duty to DaVita to advance its legitimate interests when the opportunity to do so arises.

Harassment

DaVita has a long-standing commitment to providing a work environment free from all forms of unlawful harassment. Harassment of another teammate, patient, or vendor because of that person's gender, race, religion, age, mental or physical disability, national origin, medical condition, veteran status, sexual orientation, or other status protected under the law, will not be tolerated.

Every teammate is expected to bring any evidence of harassment to DaVita's attention so that the matter can be promptly and objectively investigated and appropriate remedial action can be taken.

For a detailed discussion concerning DaVita's policy against harassment, please see the Teammate Guidelines.

Health and Safety

DaVita is dedicated to providing a working environment that is free from recognized health and safety hazards.

All DaVita centers must comply with all governmental regulations and DaVita policies and procedures that promote the protection of workplace health and safety. Our policies and practices have been developed to protect our teammates from potential workplace hazards. All teammates must comply with DaVita policies, including, but not limited to, the policies concerning personal protective equipment, universal precautions, and blood borne pathogens. A teammate must advise his or her department manager of any workplace injury or of any situation that may present a danger to our teammates or patients.

Every DaVita teammate should become familiar with safety regulations and emergency plans regarding fire and disaster in the areas in which he or she conducts business.

Environment

Teammates must properly handle, store, and dispose of medical and chemical waste in accordance with DaVita's policies and procedures. A teammate must inform his or her supervisor of any situation involving the discharge of hazardous substances, the improper disposal of waste, or any other situation that may be potentially dangerous to the environment.

DaVita teammates must comply with DaVita's environmental policies found in the Hemodialysis Policies and Procedures Manual and Peritoneal Dialysis Policies and Procedures Manual. A DaVita teammate who suspects that a violation of federal or state environmental laws has occurred should disclose that situation to the Compliance and Legal Departments.

If a potential health or safety problem exists, teammates should notify their supervisor who will then notify Risk Management in the Legal Department for follow-up.

Security

Maintaining security is a shared responsibility between teammates and DaVita. The security and protection of DaVita personnel, property, equipment and supplies can only be effective if each teammate cooperates and assists in this effort. While the Company will make reasonable efforts to provide a safe and secure workplace, it is the teammates responsibility to assist in these efforts.

Workplace Violence

Every DaVita teammate has the right to work in a safe environment. Violence, abuse or aggressive behavior will not be tolerated at DaVita. Therefore, teammates must not engage in violent acts, threaten to engage in violent acts, or bring a weapon to the workplace (this includes parking lots).

DaVita's policy against workplace violence will be enforced for all teammates, whether on Company property, while performing any job-related duties for DaVita, or at any DaVita-sponsored event, on or off DaVita premises.

For a detailed discussion of DaVita's policy against workplace violence, please see the Teammate Guidelines.

Substance Abuse

DaVita is committed to maintaining a workforce dedicated to and capable of providing quality patient care and performing other applicable duties. To that end, DaVita prohibits teammates from consuming any substance that impairs their ability to provide quality care or otherwise perform their employment duties.

The use, possession, purchase or sale of illegal drugs while on Company business or on Company property is strictly prohibited. When a DaVita teammate suspects that he or she might have a substance abuse problem, or if he or she suspects another teammate has such a problem, he or she should immediately seek guidance from his or her department manager, DaVita's Vice President for People Services, or the Chief Compliance Officer.

Unauthorized Use Of Substances Intended For Patients

DaVita prohibits illegal, improper or unauthorized use of any controlled substance that is intended for a patient.

If a teammate becomes aware of any improper diversion of drugs or medical supplies, the teammate must immediately report the incident to his or her department manager, the Legal Department or the Chief Compliance Officer.

SUMMARY

All DaVita teammates have an obligation to comply with the laws, regulations and Company policies that govern our business. Teammates are expected to know the contents of this Code of Conduct and to act in accordance with its principles.

Adherence to Company polices and procedures designed to ensure compliance with federal and state health care programs will be considered an important element in performance evaluation of managers, supervisors and all other teammates. Teammates who fail to comply with these mandates and Company polices are subject to disciplinary action, up to and including termination of employment.

A teammate should never think that an actual or suspected compliance violation is not his or her problem, even if that teammate has not participated in the action. Each and every teammate is required to report all actual or suspected violations of law or DaVita policy so that the Company can investigate and take the necessary corrective action.

Any waiver of this Code of Conduct for DaVita teammates may only be granted by the DaVita Board of Directors or a committee of the Board of Directors. Any waiver shall be promptly disclosed to all DaVita shareholders. Such a waiver may only be granted in extraordinary circumstances and only upon a determination by the Board of Directors, or a committee of the Board of Directors, that such a waiver is in the best interests of DaVita and its shareholders. No waiver shall be granted which permits or promotes violations of any federal, state or local law, statute, code or regulation.

Revised: June 2006

Appendix A: DaVita's Commandments

JV Commandments

- The business purpose of physician joint ventures is to have a partner with:
 - a commitment to creating an outstanding operation
 - the capability to help do so
 - a willingness to create awareness of the center
- Joint venture partners are never limited as to where they can refer their patients, including referring patients to a competitor center.

Physician Commandments

- DaVita pays fair market value for medical director services. It pays zero for referrals.
- Medical directors can send their patients to any center they choose without consequence for their medical director pay. Medical director contracts should have fixed terms.
- DaVita pays medical directors for the comprehensive clinical and regulatory responsibilities they assume in accepting that position.

Pharmaceutical Commandments

- Clinical Decisions are made for Clinical Reasons.
- Prescription Decisions are made by Physicians, not by DaVita.
- Use of Medication Guidelines is encouraged, but these are only recommendations.

Grassroots Campaign Commandments

- DaVita encourages patients to learn all about the nature and purpose of any letter-writing campaign. The Facility Administrator or Campaign Manager is available to answer questions.
- Patient participation in grassroots letter campaigns is VOLUNTARY.
- The patients' decision whether or not to participate in a grassroots campaign will never affect any aspect of their treatment.
- Patients are entitled to disclose their protected health information, in any campaign letter they choose to sign. However, they are not obligated to disclose that information.

DaVita Patient Citizens (DPC) Commandments

- Membership in DPC is voluntary.
- All patients will receive the same service regardless of whether or not they are members of DPC.
- Teammates should not disclose any patient information to DPC without prior written permission from the patient.

What's Wrong to Write Commandments

- No Careless Language! Some of the government officials who will read your writings do NOT have a deep understanding of the kidney care community.
- Patient Choice, not Patient Transfers! For example, in reality neither we nor the physicians ever “move” or “transfer” patients. But if you use those words, you create legal liability for yourself and the company. There is nothing wrong with the ethical promoting of a new center, and there is nothing wrong with being confident some patients will choose to transfer. But neither we nor the doctor move or transfer them.
- Reasons for JV's. We would never do a JV because a physician is threatening to pull patients out of our centers. We will only do a JV if the conditions listed in the JV Commandments are met.
- Medical Director performance issues. If you send or receive any email which contains comments that are critical of a Medical Director's pattern of performance you must copy the CCO (Chief Compliance Officer). The CCO can determine what, if any, formal process is required.

Additional Information

Talk to your supervisor or higher-level manager if your supervisor is unable to resolve an issue or question or if you are uncomfortable speaking to your supervisor about a particular matter.

Any questions or concerns about a particular law or whether an action is lawful, or any other question about the Compliance Program or this Code of Conduct should be directed to either the Chief Compliance Officer, any member of the Compliance Team, or the Legal Department of DaVita.