

# Code of Conduct



Dear Colleagues:

We have built a world-wide reputation at Cleveland Clinic of providing outstanding clinical care enhanced by innovative research and education. Because of Caregivers who live our values, we have earned the confidence of our patients and the respect of our communities.

The name Cleveland Clinic stands for honesty and integrity at the highest level. Our Cleveland Clinic Code of Conduct ensures we continue to deliver on our promise to always do the right thing.

The Cleveland Clinic Code of Conduct is part of our overall programme of Corporate Compliance. It states the ethical principles that rule our business and determine our actions in the workplace. Medical and business decisions can be complex. The Code of Conduct guides us to make the right choices.

All Cleveland Clinic trustees, Caregivers, volunteers and service providers are required to observe this Code of Conduct, abide by our legal and regulatory compliance policies, and conduct their activities in an ethical manner.

We are all accountable for staying true to our values and our professional code of conduct. We must work together to ensure our workplace environment is one that supports transparency and always doing the right thing for our patients and one another.

If you have any questions about the Code of Conduct, or ethical concerns regarding any situation arising at Cleveland Clinic, please contact your supervisor, the Department of Human Resources, the Office of Corporate Compliance, or the Law Department. If you wish to remain anonymous, you may call the confidential Reporting Line at 020.3865.0869.

Thank you for helping Cleveland Clinic become the best place for healthcare delivery and the best place to work in healthcare.

Sincerely,



**Tomislav Mihaljevic, MD**

Chief Executive Officer and President, Cleveland Clinic





# Code of Conduct

## Purpose

Cleveland Clinic is committed to the highest standards of business ethics by acting with honesty and transparency in the provision of health care services as well as in the management of its business affairs. The Code of Conduct, which has been adopted by the organisation, supplements the mission, vision and values of Cleveland Clinic and is an integral part of our Corporate Compliance Programme. Policies and procedures that support the Code of Conduct can be accessed on the intranet or obtained from a supervisor in hard copy form.

Our Code of Conduct provides guidance to all in carrying out daily activities within appropriate ethical and legal standards. The Code of Conduct provides standards of conduct to protect and promote integrity and to enhance Cleveland Clinic's ability to achieve its mission and compliance goals. The Code of Conduct is not intended to cover all situations and does not address ethics related to medical care.

## Who must abide by the Code of Conduct?

The Code of Conduct applies to the operations of Cleveland Clinic, at all Cleveland Clinic locations and regional hospitals, and other entities within the Cleveland Clinic enterprise, Cleveland Clinic Employee Health Plan, and to all individuals and entities who provide services through or for Cleveland Clinic. This includes Caregivers, clinical practitioners, volunteers, contractors, vendors, board members and officers and others conducting business for, or on behalf of Cleveland Clinic. Because the Code of Conduct is integral to our values of integrity, Cleveland Clinic will impose disciplinary action or other appropriate measures against those who fail to adhere to its principles.

# 1. Integrity in Patient Care

## Patient Rights

Cleveland Clinic continuously strives toward a culture of patient safety and delivering world-class care to all of our patients. Caregivers are expected to honor the rights of patients and to treat patients with dignity and respect, while promoting a safe care environment.

Patient confidentiality must be respected at all times. Patient information, including photos, must not be posted to a website, social media page or public forum without appropriate authorisation from the patient. Caregivers must protect patient information at all times by knowing and following the requirements of Cleveland Clinic's privacy and security policies.

## Emergency Treatment

Cleveland Clinic will provide a medical screening examination and, if appropriate, stabilizing treatment to all patients who come to a Cleveland Clinic dedicated emergency department for emergency treatment, regardless of their ability to pay. Cleveland Clinic will only transfer patients with emergency medical conditions to another facility, in compliance with Cleveland Clinic policies.

## Research

Cleveland Clinic is committed to following ethical standards in full compliance with applicable laws and regulations in any research, investigations and clinical trials conducted. Cleveland Clinic is committed to integrity in disseminating appropriate, valid scientific results in accordance with applicable regulations and guidelines. It is Cleveland Clinic's priority to protect the rights of its subjects. As in all financial accounting and record keeping, Cleveland Clinic's policy is to submit accurate and complete costs related to research grants.

# 2. Integrity in Billing and Financial Practices

## Accurate Books and Accounts

Cleveland Clinic payments and other transactions are to be properly authorised by management, and are to be accurately and completely recorded in accordance with generally accepted accounting principles and established corporate policies. This serves as a basis for managing the business and is important to meeting obligations to patients, suppliers and others. Cleveland Clinic's high standard of accuracy and documentation is necessary for tax and financial reporting requirements.

The duty to report accurate and truthful information also applies to our internal dealings. All work-time and expense records are to be reported accurately and honestly.

## Billing

Cleveland Clinic is committed to prompt, complete and accurate billing that complies with all applicable laws, rules and policies. Caregivers who handle patient charges, claims and records are to accurately document and report all services and supplies that are billed. Cleveland Clinic prohibits its Caregivers or agents from knowingly presenting, or causing to be presented, claims for payment or approval, which are false, fictitious or fraudulent. When an overpayment is identified, Cleveland Clinic will promptly return the amount received in excess of the amount due.



## 3. Integrity in the Work Place

### Confidential Information

Caregivers, as well as with those who enter into business or professional relationships with the Cleveland Clinic, are obligated to maintain the confidentiality of patients, personnel and other proprietary information. Sharing of confidential information with other Caregivers or others outside the organisation is strictly forbidden, unless the person requesting the information has a legitimate reason to receive it for Cleveland Clinic business-related purposes and the information is shared in an appropriate manner as to best protect the information. Confidential information includes patient information, which may be accessed, used or disclosed only in accordance with Cleveland Clinic privacy and security policies.

### Intellectual Property

Cleveland Clinic is committed to adhering to all applicable intellectual property laws. Additionally, Cleveland Clinic will respect the intellectual property and copyright laws regarding books, trade journals, magazines and other applicable resources. All software used in connection with Cleveland Clinic business must be properly licensed, and used in accordance with that licence.

### Outside Activities and Employment

Cleveland Clinic Caregivers and other service providers owe a duty of complete loyalty to Cleveland Clinic and should refrain from directly or indirectly performing duties, incurring obligations, or engaging in business or professional relationships where there is, or would appear to be a conflict of interest. No outside activity may interfere with job performance.

### Family and Work

Employment of an immediate relative (including a spouse, parent, stepparent, child, stepchild, sister, brother, son-in-law, daughter-in-law, sister-in-law, brother-in-law, mother-in-law, father-in-law) is not permitted where a Caregiver has a direct or indirect administrative, supervisory or decision-making authority over the related person.

### Appropriate Use of Resources

Theft, carelessness and waste have a direct impact on the organisation's success. Those employed or performing duties for Cleveland Clinic have a duty to preserve and protect the assets of the organisation and to ensure their efficient use. Cleveland Clinic computers, systems and computer accounts are intended for business use only. All information transmitted or stored in its computers and systems, including email and voicemail messages, is considered business information of Cleveland Clinic even if considered personal by a Caregiver. Cleveland Clinic may use or review such information as it deems appropriate.

### Travel and Entertainment

Travel and entertainment expenses of a Caregiver must be consistent with their job responsibilities and the needs and resources of Cleveland Clinic. Caregivers are encouraged to participate in and attend educational workshops, seminars and training sessions. Caregivers are expected to be good stewards of Cleveland Clinic resources when participating in approved business travel or when seeking reimbursement for approved business expenses.

### Professional Conduct

Intimidating and disrespectful behaviours disrupt the culture of safety and prevent collaboration, communication, and teamwork, which are required for safe and highly reliable patient care. Cleveland Clinic also has codes of conduct that address specific health care professional responsibility to patients and each other. Health care professionals must also follow the ethical standards dictated by their respective professional organisations.

### Drug Free Work Place

Caregivers, contractors or vendors may not be under the influence of alcohol or illegal drugs on company property or during work time. Caregivers are required to report any unsafe situations to their manager or Human Resources.

### Prohibition on Discrimination and Harassment

Cleveland Clinic is committed to providing a work environment in which all individuals are treated with respect and dignity. It is the policy of Cleveland Clinic to ensure that the work environment is free from discrimination or harassment on the basis of race, colour, religion/belief, gender, sexual orientation, gender identity, pregnancy/maternity, marital status, age, national origin, disability, military status, citizenship, genetic information, or any other characteristic protected by law. Cleveland Clinic prohibits any such discrimination, harassment, and/or retaliation.

## Gift Giving and Receiving

Cleveland Clinic strives to preserve and protect its reputation of integrity at all times. Accepting gifts, entertainment or meals from outside sources may create an appearance of impropriety and may violate Cleveland Clinic policies. Caregivers are always prohibited from soliciting tips, personal gratuities or gifts from any source.

Caregivers are generally prohibited from offering gifts or discounts to patients or physicians except in limited circumstances and with approval by senior management.

Caregivers should consult with their supervisor or the Law Department for additional guidance.

## Political Activity

Cleveland Clinic does not participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for political office. While Cleveland Clinic supports Caregiver participation in the political process, Caregivers are not permitted to use their position in the organisation to try to influence the personal decision of others to contribute, or to otherwise support political parties or candidates. Cleveland Clinic may choose to support specific issues with the approval of the Law Department.

## Marketing and Advertising

Marketing and advertising activities may be utilised for the following purposes: to educate the public, to provide information to the community, to increase awareness of our services and to recruit Caregivers. Marketing materials and media announcements are to be presented in a truthful, fully informative and non-deceptive manner.

## Media Relations

All requests from news reporters, the general public or other external parties for information should be referred to The Brunswick Group via email at [CCLondonCommunications@brunswickgroup.com](mailto:CCLondonCommunications@brunswickgroup.com) or via phone at +44.20.7404.5959 (London). Caregivers should never release information to journalists or to the public without permission of The Brunswick Group.

# 4. Legal and Regulatory Compliance

All activity by or on behalf of Cleveland Clinic is to comply with all applicable laws.

## Screening of Employees

All employees will be subject to a background check and other applicable required screenings prior to employment.

## Adherence to Health and Safety Laws

Cleveland Clinic London Caregivers are expected to comply with laws designed to improve workplace safety, such as properly controlling and monitoring dangerous materials and maintaining safe equipment.

## Environmental Protection

Caregivers are to dispose of all waste and other materials and store all chemicals and substances in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all government authorities in the event of an environmental incident.

## Fraud, Waste and Abuse

Cleveland Clinic policies and applicable laws and regulations prohibit fraudulent claims activity.

Performing routine audits or reviews and monitoring, along with internal controls, help Cleveland Clinic prevent and detect fraud, waste and abuse.

Cleveland Clinic expects Caregivers to report known or suspected activity of this type to the Corporate Compliance Office. Caregivers who lawfully report false claims or other fraudulent conduct or who otherwise assist in an investigation, action or testimonies are protected from retaliation to the furthest extent possible under all applicable.

## Regulation of Controlled Substances

Many prescription drugs, controlled substances and other medical supplies are governed and monitored by specific regulatory organisations and are to be administered by an authorised provider's order only. Prescription and controlled medications and supplies are to be handled properly and only by authorised individuals to minimise risks to Cleveland Clinic patients.



## Charitable Mission

Cleveland Clinic provides benefits that include healthcare services, medical training, education, research and community outreach activities. Cleveland Clinic must use its resources in a manner that furthers the public good rather than the private or personal interest of any individual or entity.

## Anti-Kickback/Bribes

Cleveland Clinic prohibits its Caregivers and other service providers from offering, paying, asking for, or accepting any money or other benefit in exchange for patient referrals, purchases, leases or orders. All contracts and interactions with other referral sources are to follow all applicable laws and regulations.

## Insider Trading

No Caregiver of Cleveland Clinic shall use non-public information acquired through employment at Cleveland Clinic to trade in the securities of any company, or buy or sell any property or assets. No Caregiver may pass on insider information to others who may make trade decisions based on this information.

## Anti-Corruption Laws

Cleveland Clinic Caregivers will not offer, authorise or promise to provide anything of value, directly or indirectly, to a foreign government official or other person or entity in connection with Cleveland Clinic's overseas transactions that does or might appear to secure an improper advantage in obtaining or retaining business.

## Responding to Government Inquiries

Caregivers are advised to consult with the Law Department and the Cleveland Clinic Chief Integrity Officer before responding to any non-routine requests from or on behalf of any governmental agency to make sure that contacts with government entities are handled properly. Cleveland Clinic Caregivers are to cooperate with any government inquiry and always be clear and truthful in response to those inquiries. When a Caregiver is aware of an existing or potential government inquiry they are not to alter or destroy records and should consult with the Law Department if there are questions.

# 5. Ethical Responsibility

Abiding by the Code of Conduct is a condition of employment for every Cleveland Clinic Caregiver. Caregivers are expected to participate in all training activities required by Cleveland Clinic.

## Reporting Any Suspected or Actual Violations

Caregivers and those affiliated with Cleveland Clinic have a responsibility to report any suspected or actual violation of the Code of Conduct or other policy irregularities to a supervisor, the Corporate Compliance Office or the Law Department. For those who wish to remain anonymous, the report may be submitted through one of the Cleveland Clinic Compliance Reporting Lines. However, it is important to understand that the Compliance Reporting Line is intended to supplement, not replace, other channels for communicating questions and concerns within the organisation. It should be used when other avenues of communication have not been effective.

## Non-retaliation

There will be no negative consequences or retaliation for good faith reporting of possible misconduct.

## Management Responsibilities

Managers must set an example and take action when compliance and ethical issues are raised. They are responsible for ensuring that their Caregivers know the content of the Code of Conduct. Managers are responsible for seeking help from the Compliance Office for themselves and their Caregivers when the right action is not clear or when questions arise.

## Resources and Contact Information

Violations or suspected violations of the law, Cleveland Clinic policy or this Code should be reported. The Compliance Reporting Line is intended to supplement, not replace, other channels for communicating questions and concerns within the organisation. It should be used when other avenues of communication have not been effective or you are uncomfortable with disclosing your identity when reporting a concern. The call will not be traced. Anonymity, if requested, will be protected up to the limits of the law.

### System-wide Anonymous Reporting

**Cleveland Clinic London ..... 020.3865.0869**

**Cleveland Clinic Chief ..... 001.216.444.3692**  
**Integrity Officer**

**Corporate Compliance Office..... 001.216.444.1709**

**Law Department..... 001.216.448.0200**

Please note the calls to Cleveland Clinic Chief Integrity Officer, Corporate Compliance Office and Law Department are long distance calls and tolls will apply.

Anonymous e-mail reporting option is also available from the Corporate Compliance Intranet: <http://portals.ccf.org/compliance/Report-a-Concern>

