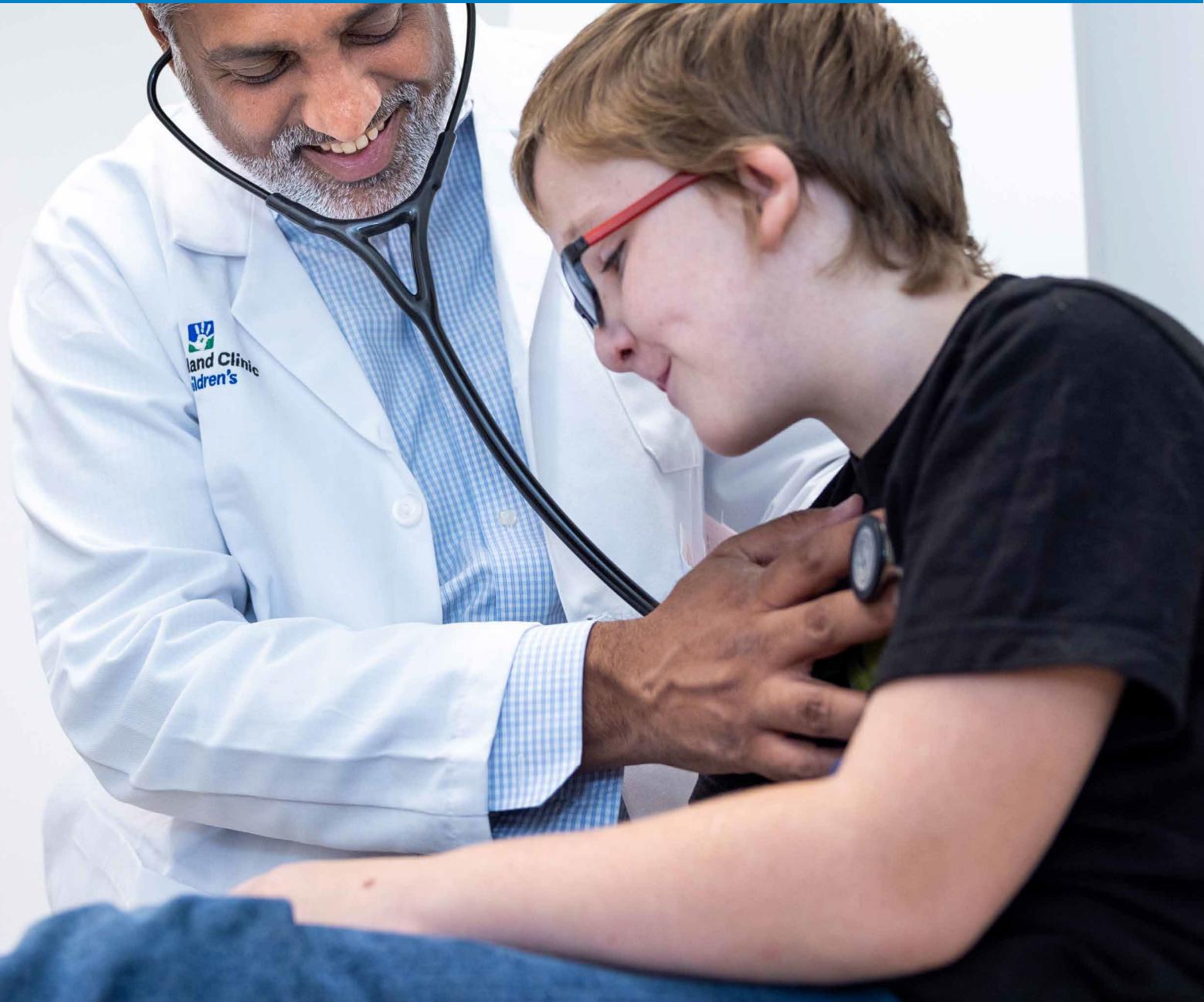


# Code of Conduct





Dear Colleagues:

We have built a worldwide 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 program 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 800.826.9294.

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. We pursue honesty and transparency in the provision of healthcare services as well as in the management of business affairs. The Code of Conduct, which has been adopted by the organization, supplements the mission, vision and values of Cleveland Clinic and is an integral part of our corporate compliance program. 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 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, the 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, students, 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 value 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.

Cleveland Clinic does not exclude patients or treat them differently on the basis of race, color, culture, ethnicity, national origin (including limited English proficiency and primary language), age, disability, religion, socioeconomic status, sex (including pregnancy or related conditions), or manner of payment. Reasonable modifications for individuals with disabilities, and appropriate auxiliary aids, services and language assistance are provided free of charge to ensure equal access to our health programs and/or activities.

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 authorization 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 state and federal requirements and Cleveland Clinic policies.

## Research

Cleveland Clinic is committed to following ethical standards in full compliance with federal and state 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 authorized 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 in 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 and payable under any regulatory requirements.

## Confidential Information

Caregivers, as well as with those who enter into business or professional relationships with 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 organization 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 but is not limited to protected health 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 license.

## Outside Activities and Employment

Cleveland Clinic caregivers and other service providers owe a duty of complete loyalty to the 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 but not limited to 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 organization's success. Those employed or performing duties for Cleveland Clinic have a duty to preserve and protect the assets of the organization 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, cellular phones and systems, including email, text 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.

## 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 the Human Resources department.

### Prohibition on Discrimination, Harassment and Retaliation

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, color, religion, sex, pregnancy, marital status, age, national origin, ethnicity, ancestry, disability, military (including veteran) status, citizenship, genetic information, or any other characteristic protected by federal, state, or local law. Cleveland Clinic prohibits any such discrimination or harassment and also prohibits retaliation against any caregiver for bringing or lodging a complaint of discrimination or harassment or engaging in any other activity protected by law.

### Professional Conduct

Intimidating and disrespectful behaviors 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 healthcare professional responsibilities to patients and each other. Healthcare professionals must also follow the ethical standards dictated by their respective professional organizations.

### 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 organization to try to influence the personal decision of others to contribute, or to otherwise support political parties or candidates, except as lawfully permitted through political action committees. Cleveland Clinic may choose to support specific issues with the approval of the Law Department.

### Marketing and Advertising

Marketing and advertising activities may be used 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 Corporate Communications Media Relations Office. All media requests must be coordinated by a Corporate Communications representative. Caregivers should never release information to journalists or to the public without permission of Corporate Communications.



All activity by or on behalf of Cleveland Clinic is to comply with all applicable federal, state and local laws and regulations.

### Excluded, Denied and Restricted Party Screening

Cleveland Clinic will not employ or conduct business with individuals or entities that have been denied, debarred, or excluded through relevant sanctions or regulations, or who are otherwise ineligible for participation in federal or state healthcare programs. As a condition of employment, caregivers are required to notify Human Resources immediately if they are currently, or to the best of their knowledge, will be in the future, listed by the federal Department of Health and Human Services Office of Inspector General, the General Services Administration or the applicable state Medicaid Exclusion and Suspension List as a person who is excluded from participation in federal or state healthcare programs.

### Trade Restrictions and Export Controls

Cleveland Clinic is committed to complying with all applicable export, import and trade compliance laws in all countries in which we conduct business. All transactions, even if not crossing country borders, may be subject to national and international trade and/or export controls. Caregivers must be aware of, and strictly follow, these laws, rules and regulations when conducting business.

### Fair Labor Practices

Cleveland Clinic requires and ensures that all aspects of its employment practices are in full compliance with applicable laws and regulations, including those concerning hours, compensation, opportunity and working conditions.

### Human Rights

Healthcare providers are often the first professionals to have contact with human trafficking victims. All those required to comply with this code must be vigilant for signs of human trafficking in any aspect of our business and supply chain and to comply with Cleveland Clinic policies and procedures for reporting such concerns.

### Adherence to Health and Safety Laws

Cleveland Clinic caregivers and other healthcare providers 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 various federal and state laws prohibit fraudulent claims activity. The federal False Claims Act and state fraud and abuse prevention laws prohibit conduct such as knowingly submitting a false or fraudulent claim or using or making a false statement to get a false or fraudulent claim paid. Other laws governing Medicaid program integrity also look for ways to reduce fraud and abuse. Cleveland Clinic and its caregivers and other service providers can be prosecuted for filing inaccurate claims for reimbursement, and can be subject to civil fines, criminal penalties or both.

Performing routine audits or reviews and monitoring, along with internal controls, helps 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 both federal and state laws.

### Regulation of Controlled Substances

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

### Not-for-Profit Tax-Exempt Status

Cleveland Clinic is a tax-exempt entity because of its 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.

### Antitrust

Cleveland Clinic engages in activities that are subject to federal and state antitrust laws. Generally, these laws prohibit competitors from entering into agreements to fix prices or to reduce price competition. Cleveland Clinic caregivers should not provide information about Cleveland Clinic business to a competitor. In addition, caregivers are to refrain from engaging in unfair practices that might restrict competition.

### Anti-Kickback/Anti-Bribery

Cleveland Clinic prohibits its caregivers and other service providers from engaging in conduct that improperly influences, or even appears to improperly influence, business-related decisions. This includes, but is not limited to, offering, paying, asking for, or accepting any money, cash equivalents, or other benefit in exchange for patient referrals, purchases, leases or orders. Benefits include non-monetary incentives such as hospitality, internships, employment, and any item or opportunity that would be of value to the recipient. All contracts, interactions with referral sources, and business relationships are to follow all applicable laws and regulations.

### Insider Trading

No caregiver of the 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.

### Anti-Corruption Laws

Cleveland Clinic caregivers and parties acting on our behalf will not offer, authorize or promise to provide anything of value, directly or indirectly, to a government official or other person or entity in connection with Cleveland Clinic's cross-border 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 Corporate Compliance Office before responding to any non-routine requests from or on behalf of local, state or the federal government 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 required to participate in all training activities required by Cleveland Clinic.

## Reporting Any Suspected or Actual Violations

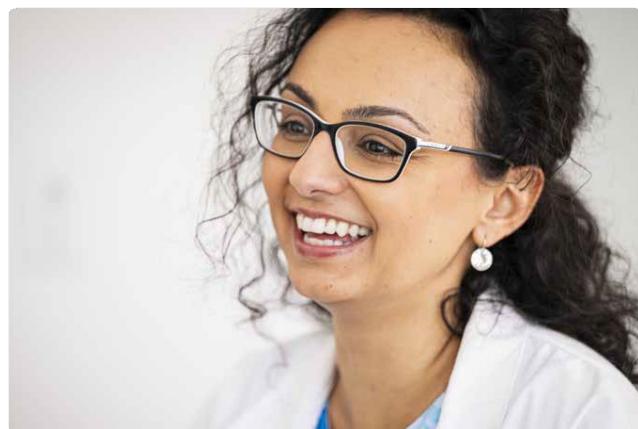
Caregivers and those affiliated with Cleveland Clinic have a responsibility to report any suspected or actual violation of the Code of Conduct or other policy irregularities to a supervisor, the Corporate Compliance Office or the Law Department. For those who wish to remain anonymous, the report may 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 organization. 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 and 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 organization. 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.

**Cleveland Clinic Chief Compliance Officer**

**216.444.6185**

**Corporate Compliance Office**

**216.444.1709**

**Florida Compliance Office**

**772.419.2975**

**Law Department**

**216.448.0200**

**Florida Law Department**

**954.689.5700 Ext. 65700**

**Enterprise-wide Anonymous Reporting**

**800.826.9294**



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honesty and integrity at the highest level.  
Our Cleveland Clinic Code of Conduct  
ensures we continue to deliver on our  
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