

# CODE *of* CONDUCT



Corporate Compliance Program  
1500 E. Duarte Road  
Duarte, CA 91010-3000  
CityofHope.org  
Compliance Hotline 877-COH-COH8 (264-2648)



20000-NEW-4908





# CORPORATE COMPLIANCE

877-COH-COH8 **Compliance Hotline**  
(264-2648)

March 2017

*To City of Hope board members, medical and allied health professional staff members, employees and volunteers:*

City of Hope has a long tradition of compassionate patient care, leading-edge research, and renowned physicians and researchers. But, there is an underlying foundation of our success that cannot be overlooked, for without it, nothing else would be possible. That foundation is our integrity. Throughout our history, we have been committed to maintaining the highest ethical standards in everything that we do. Without that commitment, our reputation, our respect, and the very quality of our care would fall into doubt.

Everyone at City of Hope should constantly strive to maintain the highest legal and ethical standards. This Code of Conduct, "A Matter of Integrity," was developed to ensure that we continue to uphold these shared values, and to provide the resources to help resolve any questions about appropriate conduct in the workplace.

This Code of Conduct is being distributed to you: every City of Hope board member, medical and allied health professional staff member, employee and volunteer. You are expected to read it, and acknowledge in writing that you understand that it represents mandatory policies of City of Hope. In addition, if you have questions regarding this Code of Conduct, or encounter any situation that you believe violates the Code's provisions, or simply "doesn't feel right," you should immediately consult your supervisor, another member of management or the Corporate Compliance Office. You may also call the Corporate Compliance and Integrity Hotline at 877-COH-COH8 (264-2648).

"Integrity" is a powerful concept, not easily defined on paper, but essential to an organization like ours. And, while our integrity is a source of strength, it is also inherently fragile — it takes only one individual's actions to tarnish it irreparably. It is our hope that this Code of Conduct will provide guidance to navigate the complex legal and ethical issues we face in our business every day, and will emphasize those ideals and principles that all of us at City of Hope share.

Each one of us has an essential role to play in ensuring our organization's integrity. Each of us is responsible for conducting our business with the highest ethical standards, and for encouraging our co-workers to do the same. We ask you to assist us in supporting these principles which are so vital to achieving our mission. Thank you for continuing to make City of Hope an institution of which we can all be proud.

Sincerely,

Norman C. Payson, M.D.  
Chair of the Board

Robert W. Stone  
President and CEO

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## **CITY OF HOPE MISSION**

*City of Hope is transforming the future of health. Every day we turn science into practical benefit. We turn hope into reality. We accomplish this through exquisite care, innovative research, and vital education focused on eliminating cancer and diabetes. ©2012 City of Hope*

## **CITY OF HOPE VALUES**

- Compassion
- Service with a Sense of Urgency
- Integrity
- Intellectual Curiosity
- Excellence
- Collaboration

## **PURPOSE OF OUR CODE OF CONDUCT**

This Code of Conduct is a summary of City of Hope's policy regarding ethical conduct and workplace behavior and the City of Hope Corporate Compliance Plan. The purpose of our Code of Conduct is to provide general guidance on subjects of wide interest within the organization. It does not eliminate or supersede other policies, such as the existing Code of Organizational Ethics, and those governing employee grievance procedures, employee benefits, accounting and auditing policies. Rather, this Code of Conduct is for use in conjunction with these other policies.

The Code of Conduct sets forth City of Hope's values and standards of conduct for the performance of our unique mission. It governs the behavior of all City of Hope board members, medical and allied health professional staff members, employees and volunteers — upon whose efforts and commitment we depend. Since City of Hope expects ethical conduct in all its activities, it is your personal responsibility and commitment to comply with the fundamental and pre-eminent value of integrity.

City of Hope provides you with policies, training and other aids to help fulfill the responsibilities set forth in this Code of Conduct. Each of you is expected, however, to take responsibility for your own actions and to seek guidance when you have questions about your responsibilities.

This Code of Conduct overlays all business relationships at City of Hope. It requires that every one of us — board members, medical and allied health professional staff members, employees and volunteers — not only conduct business in compliance with laws and regulations, but also in an ethical manner.

City of Hope is firmly committed to preventing and detecting violations of the Code of Conduct, halting such behavior immediately after its discovery, disciplining individuals

who violate the Code of Conduct, making appropriate changes to policies and procedures to prevent recurrences of violations, and reporting violations voluntarily to government authorities when appropriate.

## **REPORTING OBLIGATIONS**

### ***Personal Obligation to Report***

City of Hope is committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing whenever it may occur. Employees have an individual responsibility for reporting any activity by any employee, medical and allied health professional staff member, subcontractor or vendor that appears to violate applicable laws, rules, regulations or this code.

### ***Resources for Guidance and Reporting Violations***

To obtain guidance on an ethics or compliance issue or to report a suspected violation, you may choose from several options. We encourage the resolution of issues at a departmental level whenever possible. It is an expected good practice, when you are comfortable with it and think it is appropriate under the circumstances, to raise concerns first with your supervisor. If this is uncomfortable or inappropriate, another option is to discuss the situation with another member of management or the Corporate Compliance Office. You are always free to contact the Corporate Compliance and Integrity Hotline at 877-COH-COH8 (264-2648).

City of Hope makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct. There is no retaliation for reporting a possible violation in good faith. Any person who deliberately makes a false accusation with the purpose of harming or retaliating against another person will, however, be subject to discipline.

### ***Corporate Compliance and Integrity Hotline***

City of Hope maintains a readily available toll-free Corporate Compliance and Integrity Hotline (the "Hotline") to enable and encourage you to report suspected or potential violations of applicable laws, regulations, and City of Hope standards and policies. The Hotline is run by a professional outside vendor and is answered by Hotline personnel 24 hours a day, seven days a week. This feature aids in making the Hotline readily available to everyone. No calls are traced or recorded. All phone calls or other documentation received are logged, including the caller's name, department and phone number (if given) and the nature of the conduct reported.

City of Hope permits individuals using the Hotline to report problems anonymously. In the event that you make an anonymous report, the Hotline operator provides you with

a unique code to allow for follow-up with additional information about the report, and to permit you to be advised as to whether action was taken with respect to the report. Persons making reports anonymously are informed that their identity may become known during the course of an investigation or may have to be disclosed under certain circumstances, for example, if a governmental authority becomes involved.

The Corporate Compliance Office maintains logs of all Hotline calls and regularly reports to the Executive Compliance Committee and board of directors regarding all Hotline reports received, their status and disposition.

### ***Internal Investigations of Reports***

All reported concerns are investigated promptly and confidentially to the fullest extent possible. The Corporate Compliance Office coordinates any findings from the investigations and recommends corrective action or changes that need to be made.

### ***Corrective Action***

Where an internal investigation substantiates a reported violation, the corrective action is initiated, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary, and implementing systemic changes to prevent a similar violation from recurring in the future.

### ***Retaliation for Reporting is Prohibited***

When an employee reports a problem or concern in good faith, calls the Hotline, or cooperates with an investigation or corrective action, the employee is protected from retaliation, retribution or harassment. City of Hope takes reports of retaliation very seriously. Employees who do not follow this policy are subject to disciplinary action up to and including loss of their jobs.

## **LEADERSHIP RESPONSIBILITIES**

While everyone is obligated to follow this Code of Conduct, we expect our leaders to set an example, to be in every respect role models. Supervisory and management personnel must endeavor to ensure that those who report to them have sufficient information to comply with the applicable laws, regulations and policies, as well as the resources to resolve ethical dilemmas. They must help to create a culture within City of Hope that promotes the highest standards of leadership, ethics and compliance. This culture must encourage everyone in the organization to raise concerns when they arise. Ethical and compliant behavior must never be compromised in the pursuit of business objectives.

I. **RELATIONSHIPS WITH OUR HEALTH CARE PARTNERS**  
***Patient Care and Rights***

## **PATIENTS**

### ***Highest Quality Care***

Our mission is to provide the highest quality health care to all of our patients. We are committed to using the most effective therapies we have to cure disease, delay its ravages, alleviate pain, and support patients and their families in all phases of their illness. Our valued pursuits of research and education require at least three conditions: participants who are informed about the risks, discomforts and expected benefits of any procedure or treatment and of the availability of alternatives; actions which focus upon the patients' therapeutic needs; and the transmission of accurate information based upon sound scientific evidence. Though clinical therapy and research are expensive endeavors demanding conscientious stewardship, financial considerations should not dictate the quality of care offered to each patient.

### ***Respect and Dignity***

We treat all patients with respect and dignity and provide care that is both necessary and appropriate. We make no distinction in the admission, transfer or discharge of patients or in the care we provide based on race, color, religion, national origin or sexual orientation. Clinical care is based on identified patient health care needs, not on patient or City of Hope economics.

We ensure patients' involvement in all aspects of their care and obtain informed consent for treatment. As applicable, each patient or patient representative is provided with a clear explanation of care, including diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, advance directive options, and an explanation of the risks, discomforts and expected benefits associated with available treatment options. We provide training about patient rights to City of Hope employees involved in patient care to ensure that they clearly understand their role in supporting these fundamental rights.

### ***Confidentiality and Privacy of Patient Information***

We respect the confidential nature of personal information. We collect information about each patient's medical condition, history, medication and family illnesses to provide the best possible care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality.



- Without permission, we do not release or discuss patient-specific information with others unless it is necessary to care for the patient or required by law.
- We follow procedures when faxing, mailing, emailing or otherwise transmitting patient data outside City of Hope to keep patient information secure and safe.
- We avoid having conversations about patients in public areas where private information may be overheard by others.
- We never share passwords, and always log off computer applications that contain patient or other sensitive information.
- We never disclose confidential information that violates the privacy rights of our patients.
- No City of Hope medical and allied health professional staff member, employee or volunteer has a right to any patient information other than that which is necessary to perform his or her job.

Questions or concerns regarding use or disclosure of patient information should be directed to the privacy officer.

### ***Billing Practices***

Patients have the right to examine and receive an explanation of their bill, regardless of the source of payment. All patients, upon request, may receive a full disclosure statement of services and all charges for services provided by City of Hope. Patients who disagree with their bills may address their concerns to the Patient Financial Services Department and, if the concern is not resolved to the patients' satisfaction, to the chief financial officer.

The Financial Support Services Department is dedicated to working directly with patients and their family members, physicians and insurance agencies to assist patients with financial hardship with respect to their City of Hope payment liability. The Financial Support Services Department supplies patients or their family members with resources that may assist them in meeting their liability to City of Hope. The department will, upon request, provide patients with information regarding City of Hope's internal financial assistance program.

## **MEDICAL STAFF AND ALLIED HEALTH PROFESSIONALS**

All business arrangements with medical staff and allied health professionals are structured to ensure compliance with legal requirements. Such arrangements must be in writing and approved by the Office of General Counsel. In order to ethically and legally meet all standards regarding referrals and admissions, City of Hope strictly adheres to two primary rules: (1) We do not pay or offer to pay anyone — employees, medical staff professionals, allied health professionals or other persons — for referrals of patients. Violation of this policy may have grave consequences for City of Hope and

the individuals involved, including civil and criminal penalties, and possible exclusion from federally funded health care programs; (2) We do not accept payments for referrals that we make. No City of Hope employee, medical staff professional, allied health professional or any other person acting on behalf of City of Hope is permitted to solicit or receive anything of value, directly or indirectly, in exchange for referral of patients. Similarly, when making patient referrals to another health care provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

## **THIRD-PARTY PAYORS**

### ***Billing and Coding for Services***

We take great care to ensure that all billings to government and private insurance payors reflect truth and accuracy and conform to all pertinent federal and state laws and regulations. We prohibit any employee or agent of City of Hope from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious or fraudulent.

We operate oversight systems designed to verify that claims are submitted only for services actually provided and that services are billed as provided. These systems emphasize the critical nature of complete and accurate documentation of services provided. As part of our documentation effort, we maintain current and accurate medical records.

Any member of the City of Hope workforce is able to bring forward concerns relating to our billing or coding practices at any time by raising the issue with the Corporate Compliance Office or by calling our Compliance and Integrity Hotline at 877-COH-COH8 (264-2648). Individuals may also raise these issues with regulatory authorities directly but must also report them internally pursuant to our employment policies. Individuals raising such concerns either internally or externally shall not be retaliated against for doing so.

Any subcontractors engaged to perform billing or coding services must have the necessary skills, quality assurance processes, systems and appropriate procedures to ensure that all billings for government and private insurance programs are accurate and complete. City of Hope contracts only with entities that have their own ethics and compliance programs for billing and coding services.

For billing and coding questions and concerns, contact the Patient Financial Services Department or the Corporate Compliance Office.

## **Cost Reports**

Our business involves reimbursement under government programs that require the submission of certain reports of our costs and operations. We comply with federal and state laws relating to all cost reports. These laws and regulations define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries. Given their complexity, all issues related to the completion and settlement of cost reports must be communicated through or coordinated with the Finance Department.

## **VOLUNTEERS AND DONORS**

Voluntary assistance is fundamental to carrying out City of Hope's mission. Our volunteers and donors are an invaluable part of meeting the needs of patients and their families. We are committed to ensuring that our volunteers and donors feel a sense of meaningfulness from their contributions and receive appropriate recognition.

### **II. INTERACTING WITH ACCREDITING BODIES**

City of Hope deals with all accrediting bodies in a direct, open and honest manner. No action is taken in relationships with accrediting bodies to mislead the accreditor or its survey teams, either directly or indirectly. We are committed to an environment in which compliance with rules and regulations is woven into the corporate culture. We accept the responsibility to aggressively self-govern and monitor adherence to the requirements of law and our accrediting bodies.

The scope of matters related to accreditation is extremely significant and broader than the scope of this Code of Conduct. Accrediting bodies may be focused on issues both of wide and narrow defined interest. In any case, where City of Hope determines to seek any form of accreditation, all standards of the accrediting group are important and must be followed.

### **III. BUSINESS INFORMATION AND INFORMATION SYSTEMS** ***Accuracy, Retention and Disposal of Documents and Records***

As a City of Hope medical and allied health professional staff member or employee, you are responsible for the integrity and accuracy of our organization's documents and records. You must not only comply with regulatory and legal requirements but also ensure that records are available to defend our business practices and actions. No one may alter or falsify information on any record or document. Medical and business documents and records are retained in accordance with law and our record retention policy. Medical and business documents include paper documents such as letters and memos, computer-based information such as email or computer files on disk, tape and

any other medium, electronic device or method, such as USB flash drives, external hard drives, or any type of backup service, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records appropriately according to City of Hope policy. You must not tamper with records, nor remove or destroy them prior to the specified date. If you have questions or concerns regarding the retention or disposition of records, contact your supervisor or the Corporate Compliance Office.

### ***Confidential Business Information***

Information about City of Hope operations is a valuable asset. Although you may use confidential information to perform your job, it must not be shared with others outside of City of Hope or even within your department unless the individuals have a legitimate need to know this information in order to perform their job and have agreed to maintain the confidentiality of the information. Confidential information includes personnel data maintained by the organization; patient lists and clinical information; donor lists; pricing and cost data; information pertaining to acquisitions, divestitures and affiliations; financial data; credit card holder; data research data; strategic plans; marketing strategies; techniques; employee lists and data maintained by the organization; supplier and subcontractor information; and proprietary computer software. Questions or concerns regarding disclosure of City of Hope business information should be directed to your supervisor.

This provision does not restrict your right to disclose information about your own compensation, benefits, or terms and conditions of employment.

### ***Electronic Media***

All communications systems, electronic mail, intranet or Internet access, or voice mail are the property of City of Hope and are to be used primarily for business purposes. Highly limited reasonable personal use of City of Hope's communications is permitted (excluding any personal long distance telephone calls); however, you should assume that these communications are not private. Employees who abuse the communications systems or use them excessively for nonbusiness purposes may lose these privileges and be subject to disciplinary action. City of Hope monitors the contents of employees' email, voicemail and computer files and reserves the right to access and disclose the contents of these communications and files.

If you have access to City of Hope's communications systems, you may not use internal communication channels or access to the Internet at work to post, store, transmit, download or distribute, knowingly or recklessly, any threatening, maliciously false or obscene materials, including anything constituting or encouraging a criminal offense, giving rise to civil liability or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, personal broadcast messages or copyrighted materials that are not authorized for reproduction; nor

are they to be used to conduct union business, a job search or open misaddressed mail. These activities may result in discharge without prior progressive discipline. Sensitive information such as intellectual property, confidential research data, patient identifiable medical information or other confidential information that is to be sent electronically outside of City of Hope must be sent via an encrypted and secure method. Employees needing to send patient identifiable medical information outside of City of Hope via email or other electronic means must use the methods detailed in City of Hope's Enterprise Information Security Policy and Information Security Standards Manual.

### ***Financial Reporting and Records***

City of Hope has established and maintained a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, physicians, employees, suppliers, donors and others. They are also necessary for compliance with tax and financial reporting requirements. All financial information must reflect actual transactions and conform to generally accepted accounting principles. No undisclosed or unrecorded funds or assets may be established. City of Hope maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.

<p>IV. <b>WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES</b> <b><i>Guiding Principles</i></b></p>
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Whatever our specific roles and tasks, we all are equal as members of the City of Hope workforce, and we affirm our mutual respect and acknowledge interdependence as co-workers responsible for the mission and integrity of the organization.

The following standards of behavior for employees promote ethical conduct. These ethical principles safeguard the interest of the institution, individuals who work here, patients and the public, and contribute to quality and efficiency in health care and science. All individuals who work at City of Hope are expected to:

- Demonstrate behavior that reflects integrity, supports objectivity and fosters trust in all of its activities.
- Respect the dignity of each human being.
- Strive to improve personal competence and quality of service.
- Represent truthfully and accurately, in oral and written communications, information regarding hospital and research programs and services, professional credentials, education and experience.

- Refuse to participate in illegal or unethical acts and refuse to conceal the illegal, incompetent or unethical acts of others.
- Protect the confidentiality of all patient information, and medical and research data, by refraining from discussing confidential business with persons not directly involved, and by discussing such information with those who have a legitimate need to know in a place and manner that protects confidentiality. Safeguard all sensitive information, intellectual property, credit cardholder information and individually identifiable information according to City of Hope policies.
- Ensure that patients and/or payors are charged only for services provided.
- Ensure that patients are transferred and/or discharged consistent with hospital policies and procedures.
- Ensure that their actions in fulfilling their job duties are without conflict of interest.
- Provide patients with multiple options when referred for services out of the hospital, and disclose to patients those options in which City of Hope has financial interest.
- Disclose to patients when a student, resident or fellow is providing care.

### ***Conflict of Interest***

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use City of Hope resources for anything other than City of Hope purposes. It is your obligation to ensure that you remain free of conflicts of interest in the performance of your responsibilities at City of Hope. If you have any question about whether an outside activity might constitute a conflict of interest, you should discuss it with your supervisor or call the Corporate Compliance Office. Whenever there may even be an appearance of a conflict of interest, you must obtain the approval of your supervisor before pursuing the activity.

### ***Controlled Substances***

Certain City of Hope employees routinely have access to prescription drugs, controlled substances and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. It is extremely important that these items be handled properly and only by authorized individuals to minimize risks to us and to patients. If you become aware of the diversion of drugs or any other medical supplies from the organization, you must report the incident immediately to the Security Department at extension 55.

## ***Equal Employment Opportunity***

Each person who works at City of Hope provides the organization with a wide complement of talents that contribute greatly to our success. City of Hope is committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity and respect. We comply with all laws, regulations and policies related to nondiscrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline and promotions.

No one may discriminate against any individual with a legally recognized disability with respect to any offer, term or condition of employment. We make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

## ***Harassment and Workplace Violence***

As a City of Hope medical and allied health professional staff member, employee or volunteer, you have the right to work in an environment free of harassment. City of Hope does not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation or other harassing conduct is not acceptable in our workplace.

Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment has no place at City of Hope.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at the employer, terrorism and hate crimes committed by current or former employees. As part of our commitment to a safe workplace, we prohibit employees from possessing firearms, other weapons, explosive devices or other dangerous materials on City of Hope premises. If you observe or experience any form of harassment or violence, you should immediately report the incident to your supervisor, the Security Department or Human Resources.

## ***Health and Safety***

City of Hope medical and allied health professional staff members, employees or volunteers, as well as all City of Hope facilities, must comply with all government regulations and rules and with City of Hope policies or required facility practices that promote the protection of workplace health and safety. Our policies have been

developed to protect you, as well as patients and visitors, from potential workplace hazards. Become familiar with and understand how these policies apply to your specific job responsibilities and seek advice from your supervisor or the chief safety officer whenever you have a question or concern. It is important that you advise your supervisor or the chief safety officer of any workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken to resolve the issue. City of Hope policies for occurrences related to patient and visitor safety and sentinel events must be adhered to when they apply.

### ***License and Certification Renewals***

If you are an employee, medical and allied health professional staff member or individual retained as an independent contractor in a position that requires a professional license, certification or other credential, you are responsible for maintaining the current status of your licenses and credentials and must comply at all times with federal and state requirements applicable to your respective discipline. To ensure compliance, City of Hope requires evidence that you possess a current license or credential status.

City of Hope does not allow any employee, medical and allied health professional staff member or independent contractor to work without valid, current licenses or credentials.

### ***Personal Use of City of Hope Resources***

It is the responsibility of each of you as a City of Hope medical and allied health professional staff member, employee or volunteer to preserve our organization's assets, including time, materials, supplies, equipment and information. Organization assets are to be maintained for business-related purposes. As a general rule, the personal use of any City of Hope asset is prohibited. All supplies are the property of City of Hope and are to be used only for business purposes. If you need to make personal copies, it must be done outside of City of Hope. City of Hope telephones are not to be used for personal long distance calls. Any community or charitable use of organizational resources must be approved in advance by your supervisor. Any use of City of Hope resources for personal financial gain unrelated to City of Hope's business is strictly prohibited.

### ***Relationships with Subcontractors and Suppliers***

City of Hope is committed to fair competition among prospective suppliers and the sense of responsibility required of a good customer. We manage our subcontractor and supplier relationships in a fair and reasonable manner consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable. Our selection of subcontractors, suppliers and vendors is made on the basis of objective criteria, including quality, technical excellence,



price, delivery and adherence to schedules, service and maintenance of adequate sources of supply and their ability to protect our sensitive information. Our purchasing decisions are made on the supplier's ability to meet our needs, and not on personal relationships and friendships. We employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities. We do not communicate to a third-party confidential information given to us by our suppliers unless directed in writing to do so by the supplier. We do not disclose contract pricing and information to any outside parties. (The subject of business courtesies, which might be offered by subcontractors or suppliers, is discussed in Section VIII of this Code of Conduct.)

### ***Substance Abuse and Mental Acuity***

To protect the interests of our employees and patients, City of Hope is committed to an alcohol and drug-free work environment. You as a medical and allied health professional staff member, employee or volunteer must report to work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing or selling illegal drugs while on City of Hope work time or property may result in discharge without prior progressive discipline. We may use employee drug testing as a means of enforcing this policy.

If you are taking prescription drugs that may impair judgment or other skills required in job performance, you should consult with your personal physician and bring any concerns to the attention of your supervisor or the Human Resources Department.

### ***Tobacco***

City of Hope is a smoke-free environment. Smoking and the use of tobacco products are strictly prohibited inside and on all properties owned and operated by City of Hope.

V. RESEARCH
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The conduct of research comprises a core component of our mission. City of Hope follows high ethical standards and requires compliance with the many complex laws and regulations governing the research conducted by our physicians and research staff. We adhere to all laws and regulations governing the conduct of research, including requirements related to the review and approval of human subjects research by our Institutional Review Board, the review and approval of animal research by our Institutional Animal Care and Use Committee and other regulatory committee approval requirements as applicable.

We do not tolerate research misconduct. Research misconduct includes making up or changing results or copying results from other studies without performing the research or providing appropriate credit.

With respect to human subjects research, all individuals asked to participate in a research project are given a full explanation of alternative services that might prove beneficial to them. They are fully informed of potential discomforts and are given a full explanation of the risks, expected benefits and alternatives. Research subjects are fully informed of the procedures to be followed, especially those that are experimental in nature. Research subjects are also fully informed of how their medical information will be used and disclosed in any research in which they participate. Refusal of a patient to participate in a research study does not compromise access to services.

If you are applying for or performing research of any type, you are responsible for maintaining the highest ethical standards in any written or oral communications regarding your research projects as well as for following appropriate research guidelines. As in all accounting and financial record keeping, our policy is to submit only true, accurate and complete costs related to research grants. You are also responsible for ensuring that your research is free from any conflicts of interest or the appearance of conflict of interest. Further, our policies regarding services provided to patients who are enrolled in research trials require that we bill in accordance with regulatory and contractual requirements.

Questions regarding the conduct of research or the legal and regulatory requirements applicable to a particular research project should be directed to the Corporate Compliance Office, City of Hope's Institutional Official for Research or, when applicable, the director of City of Hope's Human Research Protection Program.

## VI. MARKETING PRACTICES

We market our services truthfully, accurately and fairly. All marketing activities must adhere to the principles of the fundamental value and dignity of the individual, and the freedom of speech, assembly and the press.

### ***Antitrust***

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws could be violated by discussing City of Hope's business with a competitor, such as how our prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier. Our competitors are other health systems and facilities providing similar services in markets where we operate.

In general, avoid discussing sensitive topics with competitors or suppliers, unless you are proceeding with the advice of the Office of General Counsel. You also must not provide any information in response to oral or written inquiry concerning an antitrust matter without first consulting the Office of General Counsel.

### ***Gathering Information about Competitors***

It is not unusual to obtain information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information. However, it is not acceptable for you to obtain proprietary or confidential information about a competitor through illegal means. It is also not acceptable to seek proprietary or confidential information when doing so would require anyone to violate a contractual agreement, such as a confidentiality agreement with a prior employer.

### ***Marketing and Advertising***

City of Hope may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit physicians and employees. We present only truthful, fully informative and nondeceptive information regarding available services and the level of licensure and certification.

We do not make guarantees and promises in City of Hope written materials and advertisements, and we avoid the use of hyperbole in promoting our services and programs.

The communications department serves as an advocate for patients and their families when they are called upon to participate in marketing and other departmental projects. Patients and their families are informed of their prerogative to refrain from answering questions they deem personal. Furthermore, the department will always strive to portray patients and their families in the best possible light, whether the medium is broadcast, Web-based, photography or written copy.

<b>VII. ENVIRONMENTAL COMPLIANCE</b>
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It is City of Hope's policy to comply with all environmental laws and regulations as they relate to our operation. We act to preserve our natural resources to the full extent reasonably possible and operate our facilities with the necessary permits, approvals and controls. We diligently employ the proper procedures with respect to handling and disposing of hazardous and biohazardous waste, including but not limited to medical waste.

In helping City of Hope comply with these laws and regulations, you must understand how your job duties may impact the environment, adhere to all requirements for the

proper handling of hazardous materials, and immediately alert your supervisor to any situation regarding the discharge of a hazardous substance, improper disposal of medical waste or any situation that may be potentially damaging to the environment.

## VIII. BUSINESS COURTESIES

Nothing in this section of the Code of Conduct should be considered in any way as an encouragement to make, solicit or receive any type of entertainment or gift. For clarity purposes, please note that these limitations govern activities with those outside of City of Hope. This section does not pertain to actions between the organization and its employees or actions among City of Hope employees.

### ***Receiving Business Courtesies***

There will be times when you may wish to accept from a current or potential business associate an invitation to attend a social event in order to further develop your business relationship. These events must be reasonable and appropriate. As a City of Hope employee, you may be offered gifts from an individual or organization who has a relationship with City of Hope. For purposes of this paragraph, City of Hope physicians and patients are considered to have such a relationship. Nominal gifts (e.g., valued at \$75 or less per person) or perishable or consumable gifts given to a department or group may at times be appropriate and accepted. If you have any questions regarding the appropriateness of a gift you have been offered or given, contact your supervisor immediately. You may never accept cash or cash equivalents, such as gift certificates, and under no circumstances may you solicit a gift.

### ***Extending Business Courtesies***

Any entertainment or gift involving physicians or other persons who are in a position to refer patients to our health care facilities must comply with all federal laws, regulations and rules regarding these practices.

There may be times when you may wish to extend to a current or potential business associate (other than someone who may be in a position to make a patient referral) an invitation to attend a social event in order to further or develop your business relationship. The purpose of entertainment must never be to induce referral or any other specific business action. During these events, topics of a business nature must be discussed. All such events and their associated costs must be approved in advance by your supervisor. The cost associated with such an event must be reasonable and appropriate. Moreover, such business entertainment with respect to any particular individual should be infrequent. Under no circumstances does the organization permit participation in any business entertainment that might be considered lavish.

If you have questions regarding the appropriateness of any event, contact your supervisor or the Corporate Compliance Office.

Also, City of Hope will routinely sponsor events with a legitimate business purpose. Provided that such events are for business purposes, reasonable and appropriate meals and entertainment may be offered. All elements of such events, including these courtesy elements, must be consistent with the corporate policy on such events.

You must avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with City of Hope. We never use gifts or other incentives to influence relationships or business outcomes improperly. Gifts to business associates who are not government employees must be nominal and must never be intended to induce a specific business decision.

U.S. federal and state governments have strict rules and laws regarding gifts, meals and other business courtesies for their employees. City of Hope's policy is not to provide any gifts, entertainment, meals or anything else of value to any employee of the federal or state government, except for minor refreshments in connection with business discussions or promotional items with City of Hope's logo valued at no more than \$10. With regard to gifts, meals and other business courtesies involving any other category of government official or employee, you must determine the particular rules applying to any such person and carefully follow them.

The corporate policy on business courtesies may, from time to time, provide flexibility in order to permit appropriate recognition of donors and of the efforts of those who have spent meaningful amounts of volunteer time on behalf of City of Hope.

## IX. POLITICAL ACTIVITIES AND CONTRIBUTIONS

City of Hope's political participation is limited by law. City of Hope funds or resources may not be used to contribute to political campaigns or for gifts or payments to any political party or any of their affiliated organizations. Such resources include financial and nonfinancial donations such as using work time and telephones to solicit for a political cause or candidate, or the loaning of City of Hope property for use in a political campaign.

It is important to separate personal and corporate political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials. You may, of course, participate in the political process on your own time and at your own expense. While you are doing so, it is important not to give the impression that you are speaking on behalf of or representing City of Hope in these activities. You cannot seek to be reimbursed by City of Hope for any personal contributions for such purposes.

It is a part of the role of some City of Hope management to interface on a regular basis with government officials. If you are making these communications, be certain that you are familiar with any regulatory constraints and observe them. Guidance is always available from the Office of General Counsel.

## X. REGULATORY COMPLIANCE

City of Hope provides varied health care services and conducts many research activities, many of which are provided only pursuant to applicable federal, state and local laws and regulations. Such laws and regulations may include subjects such as licenses, permits, accreditation, access to treatment, consent to treatment, medical record keeping, access to medical records and confidentiality, patients' rights, end-of-life care decision-making, medical staff membership and clinical privileges, corporate practice of medicine restrictions, Medicare and Medi-Cal regulations, and other rules regarding the use of federal funds for either health care or research purposes. City of Hope is subject to numerous other laws in addition to these health care and research regulations.

City of Hope has adopted a Corporate Compliance Plan and intends to comply with all applicable laws and regulations. All board members, medical and allied health professional staff members, employees, volunteers and contract service providers must be knowledgeable about and ensure compliance with all laws and regulations and should immediately report violations or suspected violations to the Corporate Compliance Office.

City of Hope is forthright in dealing with any billing inquiries or requests to substantiate any charges to a state or federal funding source. Requests for information will be answered with complete, factual and accurate information. We will cooperate with and be courteous to all government inspectors and provide them with the information to which they are entitled during an inspection. During a government inspection, you must never conceal, destroy or alter any documents, lie or make misleading statements to the government representative, nor should you ever attempt to cause anyone else to do so.

In order to ensure that we fully meet all regulatory obligations, City of Hope employees must be informed about stated areas of potential compliance concern. City of Hope, through our Corporate Compliance Plan, provides board members, medical and allied health professional staff members, employees and volunteers with the information and education they need to comply with all applicable laws and regulations.

XI. <b>THE CORPORATE COMPLIANCE PLAN</b> <b><i>Plan Structure</i></b>
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The Corporate Compliance Plan is intended to demonstrate in the clearest possible terms, the absolute commitment of City of Hope to the highest standards of ethics and compliance. That commitment permeates all levels of the organization. There is a chief compliance officer who reports directly to the chief executive officer and to the board of directors. The chief compliance officer is supported by the corporate compliance officers.

To address areas of specific regulatory focus, City of Hope has established the following committees: the Executive Compliance Committee, the Revenue Cycle Compliance Committee, the Medical Foundation Compliance Committee, and the Conflict of Interest and Commitment Committee. These committees are designed to guide and monitor governance and risk, privacy and security, research, health care regulations, billing and coding regulations, revenue cycle practices, and conflict of interest in accordance with all applicable laws and regulations, all relevant internal rules, policies and procedures, and the highest ethical standards.

***Internal Audit and Other Monitoring***

City of Hope is committed to the ongoing monitoring of compliance with corporate policies. This monitoring is conducted at the departmental level as well as by internal audit and the Corporate Compliance Office. City of Hope also seeks other means of ensuring and demonstrating compliance with laws, regulations and City of Hope's policies.

***Education and Training***

City of Hope is committed to providing regular education and training to you — our board members, medical and allied health professional staff members, employees and volunteers — relative to City of Hope's Corporate Compliance Plan and corporate ethics. Additional regular training is provided to employees and medical and allied health professional staff members responsible for claim development and submission, business negotiations and research.

### ***Acknowledgment Process***

City of Hope requires each of you — our board members, medical and allied health professional staff members, employees and volunteers — to sign an acknowledgment confirming that you have received this Code of Conduct and understand that it represents mandatory policies of City of Hope. New employees are required to sign this acknowledgment as a condition of employment.

Adherence to and support of this Code of Conduct, as well as participation in related activities and training, are considered in decisions regarding hiring, promotion and compensation for all candidates and employees.



