

## CODE OF CONDUCT

### VII. Working Environment

- VII.1. Covered persons shall treat others fairly and with honesty, dignity, and respect.
- VII.2. Covered persons shall not engage in or tolerate unlawful discrimination.
- VII.3. Covered persons shall not use their positions of authority to coerce, intimidate, or improperly influence another regarding the use of their personal funds, property, or time.
- VII.4. Covered persons shall follow and comply with health and safety practices and standards.

### VIII. Reporting Concerns and Non-Retaliation

- VIII.1. Covered persons shall promptly report or seek guidance regarding potential, known, or suspected violations of the Code of Conduct to their supervisor, to a university official overseeing the conduct in question, or to the Office of Compliance, which may be accomplished directly or through the use of the toll-free number allowing anonymity (800-254-0460).
- VIII.2. Covered persons shall cooperate in the investigation and resolution process regarding an allegation of a potential, known, or suspected violation of the Code of Conduct.
- VIII.3. Covered persons shall not subject any other person to retaliation, retribution, or reprisal for making a good faith report of, seeking guidance regarding, or participating in the investigation or resolution of a potential, known, or suspected violation of the Code of Conduct.



## Compliance Program and the Code of Conduct

The university has implemented a compliance program that is designed to prevent and detect violations of law and to promote a culture of compliance with the law and ethics. An essential element of this compliance program is the Code of Conduct.

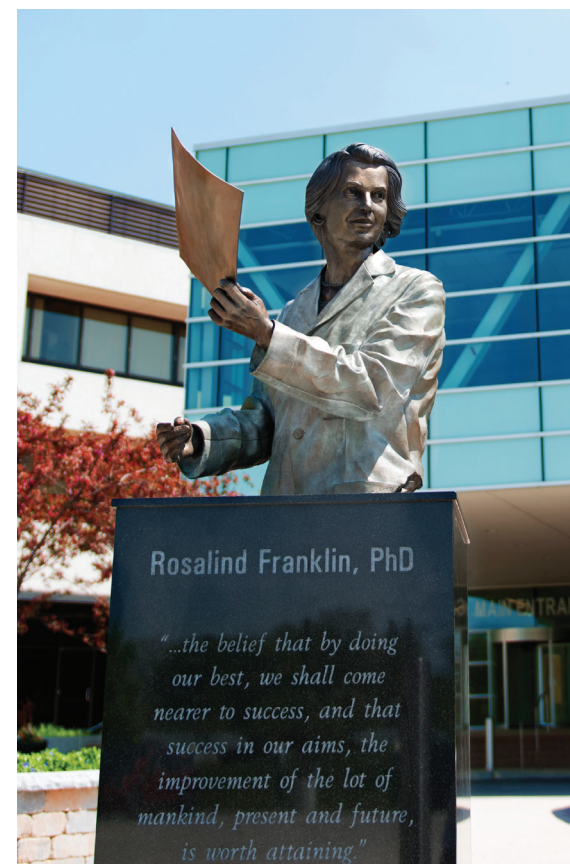
As a member of the university community, each of us has a role in ensuring the university (which necessarily acts through us) complies with the Code of Conduct. This role includes seeking guidance when appropriate and reporting potential, known, or suspected violations.

Such reporting leads to early detection and correction of problem situations, initiation of timely responsive actions, and minimizing (if not the prevention of) actual violations of law and/or any resultant harm.

These reports may be directed to:

- Your supervisor
- A university official authorized to oversee the conduct in question
- The Office of Compliance directly or through...
- EthicsPoint, a NAVEX Global company (which allows for anonymity), by either:
  - navigating to their website at <http://rosalindfranklin.ethicspoint.com>
  - dialing the toll-free number 1-800-254-0460

No person will be subject to retaliation, retribution, or reprisal for making a good faith report of, seeking guidance regarding, or participating in the investigation or resolution of a potential, known, or suspected violation of the Code of Conduct.



## Rosalind Franklin University of Medicine and Science

### CODE OF CONDUCT



**ROSALIND FRANKLIN  
UNIVERSITY**  
*of* MEDICINE AND SCIENCE

#### Office of Compliance

Bret Moberg  
3333 Green Bay Road  
North Chicago, IL 60064  
847-578-8308



## What Is the Code of Conduct and Why Do We Have One?

The university necessarily acts through individuals who face decisions on a daily basis regarding the proper course of conduct while performing teaching, research or other university business activities. The Code of Conduct is a collection of broad statements designed to provide standards for proper decision-making in everyday practice that reflects the shared obligation of the entire university community to act consistently with the law and ethics.

## What Is the Scope and Applicability of the Code of Conduct?

All covered persons, when exercising authority on behalf of or in affiliation with the university, are required to comply with the Code of Conduct, violations of which may result in sanctions, including termination. "Covered persons" means university faculty, staff, volunteers, and others who exercise authority on behalf of or in affiliation with the university.

## Where May I Get Further Guidance?

Questions or requests seeking guidance about matters contained in the Code of Conduct may be addressed to your supervisor or to the Compliance Counsel (847-578-8308).



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### I. General Provisions

- I.1. Covered persons shall comply with applicable federal, state, and local laws.
- I.2. Covered persons shall perform activities with integrity, honesty, and sense of fairness.
- I.3. Covered persons shall become familiar with and act consistent with the relevant university policies and procedures.

### II. Conflicting Interests

- II.1. Covered persons shall not allow any interest to inappropriately influence their judgment or the good faith execution of their duties.
- II.2. Covered persons shall make timely disclosure to the proper authority of any interest that is or appears to be in conflict with their judgment or good faith execution of their duties.
- II.3. Any covered person who provides or is requested to provide information to a decision-maker shall contemporaneously make disclosure of any interest that is or appears to be in conflict with an accurate, unbiased, and impartial presentation of that information.
- II.4. Any covered person shall not participate as a member of a committee or board in a matter in which that covered person has an interest that is or appears to be in conflict with their judgment or good faith execution of committee or board duties.

### III. Fiscal Affairs

- III.1. Covered persons shall ensure any claim, bill, request or solicitation for funds made under their authority or control is true, to the best of their knowledge and belief, and that it does not contain false, misleading, or otherwise inappropriate assertions.
- III.2. Covered persons shall return funds in their possession or control that were collected in error.
- III.3. Covered persons may use funds in their possession or control only in accordance with the applicable conditions associated with the funds.

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### IV. Governmental Affairs

- IV.1. Covered persons shall ensure that any communication to government officials or representatives is true, to the best of their knowledge and belief, and that it does not contain false, misleading, or otherwise inappropriate assertions.
- IV.2. Covered persons shall timely respond to lawful requests of or other communications from government officials and shall not impede or obstruct the due administration of justice.

### V. Official Records and Statements

- V.1. Covered persons shall ensure, to the best of their knowledge and belief, that information entered under their authority or control into an official university record is true and that it does not contain false, misleading, or otherwise inappropriate assertions.
- V.2. Covered persons shall use reasonable safeguards to protect university records from loss or inappropriate alteration or destruction and shall not create, use, or destroy university records for the purposes of deception.
- V.3. Covered persons shall ensure, to the best of their knowledge and belief, that any verbal, written, or other statement made under their authority or control is true and that it does not contain false, misleading, or otherwise inappropriate assertions.
- V.4. Covered persons shall utilize reasonable safeguards to protect information deemed confidential from unauthorized use and disclosure and shall not use or disclose such confidential information for unauthorized purposes.

### VI. Use of University Time and Resources

- VI.1. Covered persons shall efficiently utilize university time and not waste or otherwise use university time for unauthorized or inappropriate purposes.
- VI.2. Covered persons shall protect, conserve, and efficiently utilize university resources and not waste or otherwise use them for unauthorized or inappropriate purposes.

(Continued on reverse)