

**Shriners Hospitals for Children®
Corporate Compliance Plan**

**APPENDIX A
CODE OF ETHICS**

**Shriners Hospitals for Children Hospital Regulations
ARTICLE 1**

Compliance. Code of Ethics

§101.1 Corporate Compliance Program. The Boards of Directors and Trustees of Shriners Hospitals for Children ("SHC") have adopted and endorsed a Corporate Compliance Program. Through the Corporate Compliance Program, SHC seeks to promote appropriate standards of business conduct in every aspect of corporate operations, and to assure conformance to applicable federal, state and local statutory and regulatory obligations by SHC, its officers, directors, trustees, employees, physicians, staff, volunteers, contractors, and agents (third parties that regularly do business with SHC or are on site at SHC facilities). All persons who have been appointed to positions of authority, privileged/credentialed practitioners, volunteers, and all employees of the Hospitals, in order to discharge the responsibilities assigned to them and to maintain the integrity of the Hospitals, shall abide by this Corporate Compliance Program.

Add. 11/09.

§101.2 Code of Ethics. Members of Board of Governors, including Emeriti, Associate and At Large members, the Chief of Staff, Administrator, Director of Research (if any), Director of Patient Care Services, all persons who have been appointed to positions of authority, privileged/credentialed practitioners, volunteers, and all employees of the Hospitals, in order to discharge the responsibilities assigned to them and to maintain the integrity of the Hospitals, shall abide by this Code of Ethics.

Amend. 11/00; 11/08; 11/12.

(a) Obey the law of the land and the Articles of Incorporation and Bylaws of the corporation and these Regulations, adhering to the spirit as well as the letter thereof.

(b) Demonstrate the highest standards of personal integrity, truthfulness and honesty in all their Hospital activities; administer the Hospital's affairs with impartiality, efficiency and effectiveness and in a manner that enhances its good name and mission.

(c) Be certain that their information is accurate when speaking on behalf of the Hospital; disclose when they are stating their personal opinions; and be scrupulous in the representation of their authority and avoid misleading those with whom they deal.

(d) Approach their organizational and operational duties with a positive attitude and constructively support open communication, creativity, dedication and compassion; bring credit to the Hospital by their public demeanor; accept as a personal duty the responsibility to remain informed on important and critical issues affecting the Hospital; and avoid accepting an assignment if they cannot effectively, competently and timely discharge the responsibilities of the assignment.

(e) Exercise their independent judgment in the best interest of the Hospital, and free of compromising influences and loyalties; and act responsibly and in good faith, and in a manner not designed or intended to bring them personal gain from the discharge of their Hospital duties.

(f) Give notice, in a manner consistent with the Regulations and as otherwise may be reasonable, of any duality of interest or possible conflict of interest and make it a matter of record; give notice of any direct or indirect interest in an individual or organization which is proposing or is involved in a transaction with the Hospital; give notice of any duality of interest or possible conflict of interest that affects or could affect safety or quality of care, treatment, or services; and, thereafter, refrain from voting on the matter or transaction or otherwise attempting to exert influence over the matter or transaction.

Amend. 11/08.

(g) Refrain from:

(1) Using funds or assets of the Hospital for personal gain;
(2) Soliciting or receiving, directly or indirectly, anything of value from (i) any purveyors or vendors of goods or services to the Hospital, or (ii) any person or entity for influencing their actions; or

(3) Granting or accepting favors for personal gain.

(h) As appropriate, report the unethical or inappropriate behavior of any person covered by the Code of Ethics, when informal resolution is not effective. At the Hospital, the report should be made to the Board of Governors (or, if it involves a member of the Board of Governors, to the Chairman of the Board of Trustees). At the Headquarters, the report should be made to the Corporate Compliance Officer or Corporate Compliance Committee of the Boards of Directors and Trustees, and to the Executive Vice President.

Amend. 11/08; 7/10.

(i) Refrain from using their official positions or influence either for or against any candidate for public office.

(j) Serve with respect, concern, courtesy and responsiveness, recognizing that service to Shriners Hospitals for Children is beyond service to themselves.

Add. 11/97.

§101.3 Display and Review. This Code of Ethics shall be prominently displayed in each department of each Hospital and in each department at Headquarters and it shall be periodically reviewed and discussed at department meetings.

Add. 11/97; 7/10.

SHRINERS HOSPITALS FOR CHILDREN
Articles of Incorporation and Bylaws (Colorado)

§503.9 Code of Ethics. Officers, directors, trustees and employees of Shriners Hospitals for Children, a Colorado corporation, and all who have been elected or appointed to positions of authority, in order to discharge the responsibility assigned to them by it or its governing boards, and to maintain the integrity of the corporation, shall abide by this Code of Ethics.

(a) Obey the law of the land and the articles of incorporation and bylaws of the corporation, adhering to the spirit as well as the letter thereof.

(b) Demonstrate the highest standards of personal integrity, truthfulness and honesty in all their corporation activities; administer the corporation's affairs with impartiality, efficiency and effectiveness and in a manner that enhances its good name and mission.

(c) Be certain that their information is accurate when speaking on behalf of the corporation; disclose when they are stating their personal opinions; and be scrupulous in the representation of their authority and avoid misleading those with whom they deal.

(d) Approach their organizational and operational duties with a positive attitude and constructively support open communication, creativity, dedication and compassion; bring credit to the corporation by their public demeanor; accept as a personal duty the responsibility to remain informed on important and critical issues affecting the corporation; and avoid accepting an assignment if they cannot effectively, competently and timely discharge the responsibilities of the assignment.

(e) Exercise their independent judgment in the best interest of the corporation, and free of compromising influences and loyalties; and act responsibly and in good faith, and in a manner not designed or intended to bring them personal gain from the discharge of their corporation duties.

(f) Give notice, in a manner consistent with the corporation's bylaw, of any duality of interest or possible conflict of interest and make it a matter of record; give notice of any direct or indirect interest in an individual or organization which is proposing or is involved in a transaction with the corporation; and, thereafter, refrain from voting on the matter or transaction or otherwise attempting to exert influence over the matter or transaction.

(g) Refrain from:

(1) Using funds or assets of the corporation for personal gain;

(2) Soliciting or receiving, directly or indirectly, anything of value without full and adequate consideration being paid therefore (other than *de minimus* value in an amount not exceeding \$250.00 per person per calendar year) from (i) any purveyors or vendors of goods or services to the corporation, or (ii) any person or entity for influencing their actions; and

(3) Granting or accepting favors for personal gain.

(h) Report the unethical or inappropriate behavior of directors, trustees or officers to the board of directors or trustees, when informal resolution is not effective.

(i) Refrain from using their official positions or influence either for or against any candidate for public office.

(j) Serve with respect, concern, courtesy and responsiveness, recognizing that service to Shriners Hospitals For Children, is beyond service to themselves.

Add. 1997, Amend. 2008