



<b>Ethical Principles and Conduct Policy</b> <b>("AAMC Code of Conduct")</b>	
<b>Effective Date:</b> November 1, 2022	<b>Policy Owner:</b> Chief Legal Officer
<b>Next Review Date:</b> November 1, 2025	<b>Approved By:</b> Leadership Team

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### I. Scope and Purpose

For the AAMC to achieve its mission, every employee must act with the highest ethical principles and conduct and in a manner that positively, purposefully, and legally advances the AAMC's mission with colleagues, constituents, learners, members of the academic medicine community, and the public. The AAMC believes that ethical principles and conduct derive from a strong foundation of values. The Association expects that these values will positively influence employee attitudes; guide employee actions, decision making, and behaviors; help an employee make ethical choices when confronted with a dilemma; and ultimately, allow all employees to work together to pursue the AAMC's mission and vision in a respectful, professional, harmonious and collaborative manner.

The information discussed in this policy is intended to serve as a framework, or "code of conduct", to guide employee conduct on a day-to-day basis. The AAMC does not intend to impose unnecessary barriers to individual style, professional relationships, or social interactions, instead the AAMC wants to create and maintain a culture welcoming to every employee.

This policy applies to all regular full-time employees, regular part-time employees, temporary full-time, temporary part-time employees, and any individual working for the AAMC on a paid or unpaid basis. The terms "employee" and "AAMC employee" include each of these individuals.

### II. Roles and Responsibilities

**Responsible** – Chiefs are responsible for ensuring this policy is followed within each work unit.



**Accountable** – The Chief Legal Officer is accountable for reviewing and updating this policy.

**Consulted** – Directors and Supervisors work with leadership and staff to promote ethical principles and conduct.

**Informed** – Every employee is expected to review this policy and act in an ethical manner while working at and representing the AAMC.

**All individuals informed of this policy have the responsibility to:**

**Read** the policy and give careful attention to those subjects that most pertain to your job duties.

**Understand** the purpose of this policy and your overall responsibilities for standards of business conduct.

**Discuss** this policy with your supervisor or the responsible, accountable or consulted individuals named above as appropriate for additional clarification of this policy.

### III. Policy

The AAMC strives to create and cultivate an ethical workplace culture in which every employee believes in and supports the [mission and values](#) of the AAMC in everyday business practices and operations. An ethical workplace culture:

- A. Provides fair and impartial treatment to every employee, constituent, learner, affiliate of the AAMC, or member of the public.
- B. Demands that management exemplify AAMC's values as well as listen to each employee, recognize each employee's work, and maintain ongoing dialogue about mutual obligations and responsibilities.
- C. Requires employees to act with honesty, integrity, respect, and fairness in all endeavors related to the AAMC people, programs, operations, and business.
- D. Recognizes that acting ethically as an individual and an organization is the socially responsible thing to do as ethical decisions and behaviors impact our colleagues, clusters, organization, learners, constituents, and communities.

The AAMC believes that an ethical workplace culture will promote a professional, productive and safe work environment for every employee. This type of environment creates a culture of inclusion and respect where the exchange of ideas and organizational practices are executed with integrity, courtesy, and appreciation. In maintaining an



ethical workplace culture, it is the responsibility of all employees to conduct themselves in a professional and honest manner that reflects the AAMC's values and serves our members, constituents, learners, the academic medicine community, our DC neighborhood, community partners, and the public best.

We achieve organizational success by seeking diversity of people and perspectives. We aim to create an inclusive environment where all employees feel welcome, are supported, and are encouraged to demonstrate their talents in ways that contribute to our effectiveness.

While all employees are permitted to have their own individual values and perspectives, statements or actions that are intentionally or foreseeably insulting, demeaning, or contrary to another AAMC policy such as those prohibiting workplace discrimination, harassment, abusive conduct, or retaliation, are not appropriate in the workplace. To the extent an employee has a perspective contrary to an AAMC policy position or statement or goal, the employee is not required to personally adopt the AAMC's position, but may be required to support that position in fulfillment of their job responsibilities.

The AAMC believes that professional relationships and an ethical workplace culture stem from:

#### *Mutual Respect*

Each employee at the AAMC deserves to be treated professionally and with dignity and respect in order to create an environment that brings out the full potential of the AAMC's entire staff and contributes to achieving organizational goals.

#### *Responsibility and Accountability*

The AAMC believes every employee should take responsibility (i.e., execute their work commitments) for their assigned duties, projects, and workplace conduct by meeting performance expectations and helping the organization achieve its goals.

The AAMC expects every employee to be accountable (i.e., willing to explain their actions in completing projects, fulfilling assigned duties, acting with professionalism, acknowledging when their actions or work products have fallen short) for their job responsibilities, assignments and commitments in an honest, ethical and trustworthy manner.

Each employee is also responsible and accountable for knowing and adhering to the standards set forth in AAMC policies and by the AAMC leadership.

#### *Trust & Credibility*

Each employee, work unit, cluster, and the AAMC as a whole must work together to build trust and credibility in each other. An employee's actions as well as the AAMC's actions speak to the character of the organization. By meeting commitments, treating each other



with mutual respect, and conducting ourselves honestly, the AAMC earns trust and builds credibility from constituents, members, learners, the academic medicine community, our DC neighborhood community, community partners, and the public.

#### *Open Communication*

The AAMC intends for the work environment to be conducive to open communication as it provides the opportunity for an employee to discuss, exhibit, observe, and question decisions and behaviors by colleagues. By creating an environment supportive of open and ongoing communication, an employee may prevent mistakes or wrongdoings by raising questions or reporting inappropriate or unlawful behavior without fear of retaliation.

#### *Individual Ethics*

Each employee serves as a representative of the AAMC and should act with the highest standards of ethical conduct in every interaction and professional relationship. An employee should promote truthfulness and honesty; deal fairly with colleagues and constituents; work with others to clarify expectations and ethical behavior; comply with all policies, rules, regulations, and laws; maintain confidentiality where appropriate; report suspected fraudulent activities; and propose changes leading to higher levels of organizational integrity.

The AAMC knows that an employee must make ethical decisions in a variety of situations. To this end, as a condition of employment, it is the responsibility of each employee to:

- A. Put forth honest effort in performing their duties.
- B. Act impartially and in good faith and not give improper preferential treatment to any individual or organization.
- C. Not make any unauthorized promises, especially financial in nature, to any individual or organization, including suppliers.
- D. Abide by all laws, regulations, and policies that provide for equal employment opportunities and a workplace free of discrimination, harassment, and other abusive conduct.
- E. Use the powers and resources of their position and accessibility to AAMC materials in a manner that advances the AAMC interests. Activities that allow an employee to attain an undue personal benefit or pursue any other private interest that is incompatible with the AAMC policies, operations, or goals is considered a violation of policy.



- F. Disclose any suspected incidents of waste, fraud, or other improper or illegal behaviors to a supervisor, Human Resources, or Legal Services, or to the Ethics Hotline on the AAMC’s website or via telephone at 855-729-0137.

In addition to the culture shaping expectations noted above, the AAMC believes that compliance and confidentiality practices along with managing outside relationships and conflicts of interest offer clear requirements to protect the AAMC and guide ethical decision-making and conduct for every employee.

### **Compliance**

The AAMC respects the laws that govern our business, operations, and practices throughout the organization and requires every employee to do likewise.

Each employee must recognize that significant financial repercussions and legal liabilities may occur if the AAMC or a representative of the AAMC fails to comply with relevant laws, rules, regulations, or reporting requirements. AAMC’s management is responsible for adopting policies and procedure to ensure awareness of, and adherence to, applicable compliance requirements, including reporting suspected instances of noncompliance.

#### *Key Areas of Compliance*

- A. **Asset Protection:** The AAMC assets include financial assets, physical assets (e.g., computers, furniture, supplies), data assets, and intellectual property. Each employee must take reasonable steps in accordance with applicable policies and procedures to secure and protect any assets in their custody or care to preserve their value and to honor commitments to third parties. All assets should be used for the AAMC business only, except for limited and reasonable personal use. Limited and reasonable personal use means use that does not interfere with the AAMC business or with compliance requirements or does not pose a security or reputational risk to the AAMC. Key policies in this area include the AAMC’s [Information Security Policy](#), [Acceptable Use of Computing Resources Policy](#), and [Social Media Policy](#).
- B. **Financial Integrity:** Financial integrity is critical to achieving the AAMC’s mission. It is imperative that employees, constituents, and members trust the AAMC’s financial standing and operations. The AAMC employees must adhere to requirements that support the complete and accurate maintenance of all financial records, including financial assets, transactions, and procedures in order to prevent abuse, misuse, fraud and money laundering. Key financial management policies are available on [Pulse](#) under Finance and Administrative Services.
- C. **Fraud/Misappropriation:** The AAMC will not tolerate instances of misappropriation or fraud. Misappropriation of funds, information, services or equipment may result in civil or criminal actions against the employee allegedly committing the act. Ethical conduct in research carried out by the AAMC is also critical. Key policies in this area



include the AAMC's [Compliance Reporting Policy](#) and [Public Health Service-Funded Research Misconduct Policy](#). In addition, AAMC employees must respect and comply with the intellectual property rights of others.

### **Confidentiality**

Each employee must protect the AAMC's trade secrets and other proprietary information, as well as information provided to the AAMC by third parties. An employee may not use any such information for personal gain. Employees must take reasonable precautions in accordance with applicable policies and procedures to ensure that confidential or sensitive personal information is safeguarded appropriately. If a position provides an employee with access to such information, the employee may divulge the information only on a need to know basis. In the event of a suspected disclosure of confidential or sensitive personal information, an employee must immediately notify a supervisor, Human Resources, or Legal Services, or the Ethics Hotline on the AAMC's website or via telephone at 855-729-0137.

Please refer to [policy HR 3.2](#) for specific details regarding Confidential Information. These requirements are in addition to any requirement in an individual-specific agreement between the employee and the AAMC.

### **Required Training**

Each employee is responsible for completing any required training course or activity within the timeframes specified by the AAMC.

### **Managing Relationships with Vendors, Employee Outside Interests, and Other Potential Conflicts of Interest or Commitment**

Employees owe their primary professional allegiance to the AAMC and must avoid any action that brings discredit to the AAMC or impairs their ability to carry out their professional obligation to the AAMC. A conflict of interest exists when an AAMC employee has a personal interest that could reasonably impact their judgment, decisions, or actions. The AAMC expects an employee to place the AAMC's interests above their own personal interests and disclose and take reasonable steps to address situations where personal interests might conflict or appear to conflict with the interests of the AAMC. Additionally, an employee must disclose involvement, employment or association with any outside organization or business whose interests might have the appearance of a conflict with those of the AAMC.

Please refer to AAMC's [Conflict of Interest Policy](#), [HR 3.5 Outside Employment and External Engagements](#), and [Interactions with Vendors Policy](#).

An employee may not use AAMC resources to engage in partisan political activities, including electioneering (activity for or against a candidate for public office), and must avoid any action that reasonably associates the AAMC with such political activity.

### **Deviations from Ethical Principles and Conduct**

In the event an employee behaves in a manner that violates AAMC policies or ethical principles or conduct, the AAMC reserves the right to investigate the situation and if warranted take disciplinary action. The AAMC will not tolerate any form of workplace discrimination, harassment, abusive conduct, retaliation, or violence, or any other ethical compromise that jeopardizes the integrity of the AAMC's mission, vision, values, reputation, or goals.

The AAMC reserves the right to terminate an employee immediately for serious misconduct including, but not limited to insubordination, blatant or illegal ethical violations, dishonesty, or deviations from policies and procedures (including those involving safety), nonperformance of duties, or any other conduct that significantly interferes with the efficient operation of the Association. The AAMC considers "insubordination" to be the unwillingness of an employee to carry out a directive from a supervisor, director or Chief where the directive is legal and reasonable. Insubordination may occur when an employee 1) disobeys a supervisor's instruction; 2) ridicules a supervisor; 3) takes actions that exceed authority; 4) uses silent behavior such as rolling eyes, sighs and antagonistic body language; or 5) uses profane language toward a supervisor.

Please refer to policy [HR 5.3 Corrective Action and Performance Improvement](#) and [HR 7.2 Involuntary Termination](#) for additional information regarding corrective actions and terminations.

### **Reporting Violations**

If an employee has a concern about inappropriate or illegal conduct that may violate this policy, the employee is encouraged to report it to their supervisor, Human Resources, or Legal Services, or the Ethics Hotline on the AAMC's website or via telephone at 855-729-0137. The AAMC will not tolerate retaliation against employees who in good faith raise concerns about inappropriate or illegal conduct in the workplace.

## **IV. Standards/Procedures/Requirements**

### **Employee**

An employee should be receptive to the AAMC values and act ethically on a daily basis in order to be part of creating an ethical workplace culture.

As a representative of the AAMC, an employee is encouraged to be involved in introducing a new colleague into the AAMC's environment, sharing the AAMC values, and modeling ethical behavior.

An employee is responsible for asking questions, seeking guidance, reporting suspected violations, and expressing concerns regarding violations of policy. The employee may ask themselves the following questions to help process the severity of the ethical issue:

- What feels wrong about the situation?
- Is this situation against AAMC policy or the law?
- How might the situation impact the reputation of the AAMC?
- Would the employee want this situation associated with their name on the front page of the newspaper?

An employee may seek guidance when confronted with an ethical dilemma at any time. If an employee finds that a potential ethical problem exists, they should report the suspected impropriety, dishonest, or improper act to their supervisor as that is often the most effective means of resolving a conflict. If an employee is not comfortable approaching their supervisor, they may approach their Chief, Human Resources, Legal Services or make a report through the AAMC's confidential third-party ethics reporting hotline.

### **Management**

The AAMC requires every member of management to model ethical conduct as outlined in this policy. Management must communicate expected behavioral expectations to every employee and exhibit those behaviors on a daily basis. If management does not exhibit ethical conduct routinely, it will hinder the AAMC's effort to create an ethical workplace culture.

Management is responsible for creating and maintaining a work environment conducive to open communication which allows an employee to address an ethical question or raise an ethical concern. *Remember an employee's ethical concern is not a threat or challenge to authority, rather an encouraged and accepted form of communication at the AAMC.*

Management, along with staff, will be involved in introducing a new employee into the AAMC's environment, sharing the AAMC values, and modeling ethical behavior.

If a member of management receives a report of unethical or improper conduct, they must address it immediately and resolve it as soon as practicable, including by bringing the matter to the attention of Human Resources or Legal Services.

### **The AAMC**

The AAMC will hold each employee accountable for their actions and routinely revisit and examine the actions of every employee to advance the AAMC's ethical workplace culture.

## **V. Related Policies**

[HR 1.2 Anti-Harassment Policy](#)

[HR 1.4 Non-Retaliation Policy](#)

[HR 3.2 Confidential Information Policy](#)

[HR 3.5 Outside Employment & External Engagements Policy](#)

[HR 5.3 Corrective Action & Performance Improvement Policy](#)



- [HR 7.2 Involuntary Termination Policy](#)
- [Compliance Reporting Policy](#)
- [Conflict of Interest Policy](#)
- [Internal Privacy Policy](#)
- [Interactions with Vendors Policy](#)
- [Public Health Service-Funded Research Misconduct Policy](#)
- [Acceptable Use of Computing Resources Policy](#)
- [Information Security Policy](#)
- [Social Media Policy](#)
- [Internal Control Policy](#)
- [Data Asset Owner Policy](#)

## VI. Definitions

None.

## VII. Revision History

Version	Date	Revision Description	Author
1.0	June 21, 2016		Frank Trinity
1.1	October 1, 2019	Added “Code of Conduct” to the title; updated and clarifies language (e.g., nonbinary references to gender), added information on how to access ethics hotline, updated list of related policies.	Frank Trinity
1.2	October 25, 2022	Added references to the DC neighborhood community and the public. Added language from AAMC statements on DEI and to clarify expectations relating to interactions among employees. Added a link to our mission and values statement. Added reference to required training. Added references to prohibition on abusive conduct Added reference to Non-Retaliation Policy	Frank Trinity



**VIII. Exhibits**

None.