

Code of Conduct Policy

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| Purpose: | To set forth appropriate and expected conduct. | | |
| Audience: | Regenstrief Institute | | |
| Department: | Legal and Compliance | | |
| Policy Contact: | Carl McKinley | Responsible Administrator: | Thane Peterson |
| Effective: | 9/20/16 | Last updated: | 3/8/16 |
| Comments: | Please send comments and revisions to mckinlec@regenstrief.org | | |

1. Scope

This policy applies to all individuals present in the Regenstrief building, and/or representing the Institute at internal or external meetings or gatherings (including permanent full time and part time employees, Indiana University faculty and students, contract workers, volunteers, collaborators, visiting scientists and temporary agency workers).

2. Policy Statement

The Institute endorses a Code of Conduct as a framework to help individuals understand and follow basic compliance and integrity rules that apply when present at the Institute and/or representing the Institute (including fulltime and part time employees, University faculty and students, contract workers, volunteers, collaborators, visiting scientists and temporary agency workers).

Expectations

- 2.1. The Institute's commitment to professional conduct is outlined with the following procedures:
 - 2.1.1. Personal Conduct, Our Work Environment, Dealing with Others
 - 2.1.1.1. Treat everyone with dignity, respect and compassion.
 - 2.1.1.2. Communicate openly and honestly, with respect.
 - 2.1.1.3. Do not discriminate.
 - 2.1.1.4. Provide an environment free from harassment and intimidation.
 - 2.1.1.5. Exercise good faith and fair dealings in all transactions.
 - 2.1.2. Financial Statement Integrity & Company Records
 - 2.1.2.1. Adhere to Institute's record retention policy.
 - 2.1.2.2. Provide accurate, complete and truthful records, reports, and representations.
 - 2.1.2.3. Institute financial and accounting employees, as well as senior management, have an added fiduciary responsibility to ensure that all financial practices support the full, fair, accurate and timely disclosure of financial results and conditions.
 - 2.1.3. Conflicts of Interest & Personal Integrity
 - 2.1.3.1. Comply with all laws, regulations, and company policy, in particular, Institute's Conflict of Interest Policy.
 - 2.1.3.2. Maintain the confidentiality of PHI, confidential employee information, and other confidential Institute information.
 - 2.1.4. Use of Company Assets and Resources
 - 2.1.4.1. Safeguard company assets and resources.
 - 2.1.4.2. Never use company resources for any unlawful or unethical purpose.

- 2.2. Sources for Raising/Resolving Issues and Concerns

- 2.2.1. Report suspected violations of law, this Code, Institute policy, or other improper activity immediately. Deal directly with your manager, other members of management and Organizational Development regarding employment-related issues or conflicts. Report other concerns to the Executive Operating Officer or Compliance Officer.
- 2.2.2. The Institute General Counsel must be informed anytime notification of commencement of litigation or when anyone becomes aware that litigation is reasonably anticipated. In addition, under no circumstances may an individual knowingly alter, destroy, mutilate, conceal, or falsify records with the intent to impede or influence or prevent use of such records in an official proceeding.
- 2.2.3. The Institute General Counsel must be consulted prior to, and at his/her discretion, included in any conversations with law enforcement, individuals with investigative authority (whether or not law enforcement) or attorneys when the matter is related your role at the Institute and not a personal matter. (This would not apply if you choose to consult with someone regarding a potential employment law claim against the Institute).

3. Reason for Policy

To set forth clear expectations regarding appropriate conduct.

4. Definitions

- 4.1. PHI – protected health information as defined by HIPAA.

5. Enforcement

Violation of this policy will result in appropriate disciplinary action. Additionally, individuals may be subject to loss of the Institute's information resources access privileges, and civil and/or criminal prosecution.

The administration of the policy and procedure is the responsibility of corporate management and extended staff.

6. Related Information

HIPAA

POL-ADM-053 Conflict of Interest Policy

POL-ADM-023 Corrective Action Policy

7. Revision History

| Date | Description of revision | Author |
|---------|-------------------------|----------|
| 9/17/15 | Policy drafted | K.Looney |
| 9/20/16 | Policy approved | |