

# HOPE WITH INTEGRITY CITY OF HOPE CODE OF CONDUCT





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# Our Mission and Values



## Our 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. ©City of Hope 2012

## Our Vision

We are at the center of eliminating cancer and diabetes. Through integrated networks of scientific innovation and deeply personalized care, we bring tomorrow’s discoveries to the people who need them today.

## Our Pillars

To help guide us as we work together to achieve our vision, City of Hope has adopted the following four pillars:

- Speed.** We move with speed because our patients and their families cannot wait.
- Focus.** We focus our time and resources in the areas where we can make the greatest impact.
- Enterprise.** We work together as an enterprise because coordination, integration and innovation will unite us in success.
- Connectedness.** We collaborate with diverse talent and outside partners who share our values and commitment to winning the fight against cancer and diabetes.

## Our Values

- Compassion.** We demonstrate kindness, empathy and respect in our interactions with patients, their families and our colleagues.
  - Service with a Sense of Urgency.** We provide exceptional benefit to those we serve, conducting our business with honesty, purpose and an eye toward improving the future.
  - Integrity.** We follow through on our commitments, we hold ourselves and others accountable for our actions and consistently make the best choice for our organization and its mission.
  - Intellectual Curiosity.** We are life-long learners committed to challenging the status quo. We think about what is possible, not just what has been done before, and are not afraid to ask: “What could be possible?” in our quest to continuously improve and grow.
  - Excellence.** We strive for the highest quality in all we do and are driven to continuously improve both our outcomes and processes.
  - Collaboration.** We actively share thoughts and ideas, and we cultivate quality and integrity in our relationships with one another as well as with our community partners.
- Learn more about our values on our [website](#).

# Message from Robert W. Stone and Glenn D. Steele Jr.

Dear Colleagues,

Our mission, which has guided City of Hope for more than a century, speaks to our history of steadfast commitment and integrity. As an organization, we have an unwavering dedication to honest and ethical behavior, and it is our expectation that every individual at City of Hope lives up to that shared responsibility.

In today’s rapidly transforming health care environment, it is more important than ever that we stay true to our principles and purpose.

City of Hope’s Code of Conduct is a resource to help you navigate today’s complex legal and ethical issues. It ensures that we uphold our shared values. You play an essential role in ensuring that honest and ethical behavior continues to be the cornerstone of our culture and we thank you for your continued commitment.

Sincerely,



**Robert W. Stone**  
President and CEO



**Glenn D. Steele Jr., MD, PhD**  
Chair of the Board

## Hope with Integrity in Action

*Our Code of Conduct inspires us to be our best each and every day and in everything we do.*

Hope with integrity: What does it mean? Our patients and their families come to us with hope for the future, and we turn that hope into reality. That transformation can only happen if we act with the utmost integrity at all times, in all our duties and in all our interactions – with each other, our patients and their families, our health care partners, our contractors and suppliers, and our communities.

Our values define who we are and what we believe. Our Code defines the behaviors that bring our values to life. We expect the entire City of Hope workforce – employees, volunteers, board members, medical and allied health professionals, contractors, and all those who do work on our behalf – to comply with our Code.



# Our Responsibilities

We are all responsible for acting with integrity at all times. We hold ourselves and others accountable to this commitment.

At City of Hope, we are responsible for the integrity of our work and behavior. Whatever our specific roles, we have mutual respect for one another and acknowledge our interdependence. We deliver hope with integrity by:

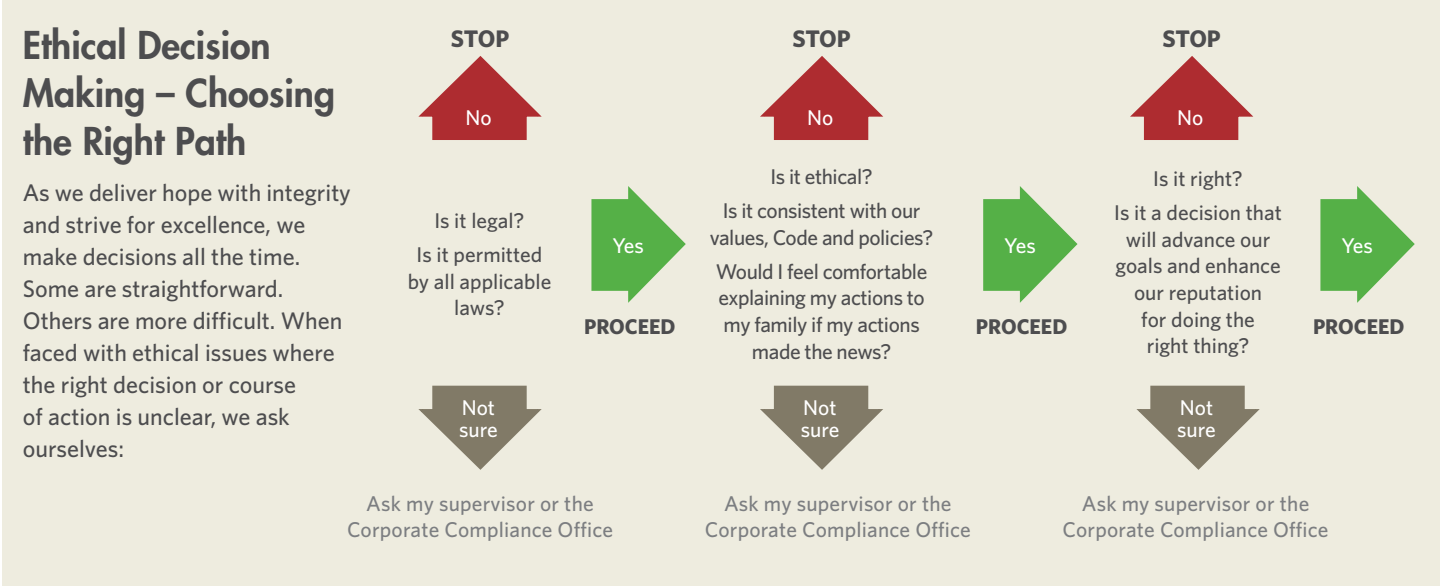
- Demonstrating behavior that reflects integrity, supports objectivity and fosters trust.
- Respecting the dignity of each human being.
- Striving to improve personal competence and quality of service.
- Representing truthfully and accurately, in oral and written communications, information regarding community, hospital, and research programs and services; professional credentials; education; and experience.
- Refusing to participate in illegal or unethical acts or to conceal the illegal or unethical acts of others.
- Sharing patient information and medical and research data only with those with a legitimate need to know in a place and manner that protects confidentiality.
- Safeguarding all sensitive information, intellectual property, credit cardholder information and individually identifiable information.
- Charging patients and/or payors only for services provided.
- Transferring and/or discharging patients with the utmost of care.
- Avoiding conflicts of interest.
- Providing patients with multiple options when referred for services outside of City of Hope and its clinical network locations and disclosing to patients those options in which City of Hope has a financial interest.

- Notifying patients when a student, resident or fellow is providing care.
- Speaking up when we witness, observe or suspect misconduct.
- Reporting suspected compliance violations to a supervisor, the Corporate Compliance Office, or the Corporate Compliance and Human Resources Hotline.

## Leading with Integrity – Responsibilities of Leaders and Supervisors

While everyone is obligated to follow our Code, we expect our leaders to set an example and serve as role models in every respect. Supervisors and managers are responsible for:

- Talking about the importance of ethics and compliance with their teams on a regular basis.
- Exemplifying ethical behavior in all of their interactions.
- Keeping their teams well informed of and able to comply with all applicable laws, regulations and policies.
- Giving their teams the resources to resolve ethical dilemmas.
- Creating a culture that promotes the highest standards of leadership, ethics and compliance.
- Creating a safe environment for employees to speak up when they have concerns or disagree with a particular plan or decision.
- Listening when employees raise concerns, taking those concerns seriously and working to resolve them through the proper channels.
- Never retaliating against those who report concerns.





Hope with Integrity in Action

**Q** Lian works in City of Hope’s Media Relations Department. Her former supervisor, Fred, mentored her into a management position. She recently witnessed her new supervisor, Theo, using City of Hope resources improperly and anonymously reported the incident to the Corporate Compliance and Human Resources Hotline, triggering an investigation.

Shortly after that, Theo calls Lian into his office and tells her that he and others believe that her promotion was based on her friendship with Fred, that her team

has no confidence in her work and that she isn’t ready for management.

Lian, who has had only positive reviews in the past, fears that Theo knows she reported him and that he is retaliating against her. Should she report her concerns?

**A** Yes. It is possible that Theo is retaliating against Lian. The investigation team should be advised of Lian’s concerns about retaliation.

Zero Tolerance for Retaliation

We value and protect our people. We never allow retaliation of any kind against those who in good faith report misconduct or participate in investigations. Any retaliatory action or threat is a serious violation of our Code, and, if proven, those involved will be disciplined up to and including termination. Any person who deliberately makes a false accusation with the purpose of harming or retaliating against another person will be disciplined up to and including termination.

How We Uphold Our Values

*Everyone at City of Hope constantly strives to maintain the highest legal and ethical standards in everything we do. We hold ourselves and others accountable for doing the right thing, and we hold ourselves accountable when we fall short of our ideals.*

Internal Investigations of Reports

City of Hope investigates all credible reports of misconduct. Investigations are kept as confidential as possible. We are expected to respond promptly and truthfully to any requests for assistance and to cooperate fully during the investigation process.

Fair Process and Corrective and Disciplinary Action

Actions have consequences. City of Hope never takes disciplinary action without first conducting a full and fair investigation. Any of us who becomes involved in an improper activity may be disciplined, even those who personally report it. However, voluntary reporting and truthfulness during the investigative process are considered when determining disciplinary action.

Those who are found to have violated our Code will be disciplined up to and including termination. Depending on the type of improper activity, there could also be legal and/or criminal consequences. Investigations may also result in corrective actions. These may include prompt restitution of any overpayments, notification to appropriate governmental agencies and process changes designed to prevent similar violations.



DOING WHAT IS BEST  
FOR OUR PATIENTS  
AND THEIR FAMILIES







## Providing the Highest-Quality Care

*Hope with integrity means that we treat the whole person. Not only do we provide the best medical care possible but we also deliver that care in an atmosphere of hope, kindness and compassion.*

We bring science and hope together through extraordinary collaborations between doctors and scientists. We create innovative therapies that save lives and make families whole again.

Our goal is to provide the highest-quality health care to all our patients. We use the most effective therapies to cure disease, delay its ravages and alleviate pain. We support patients and their families in all phases of illness and recovery.

Hope with integrity extends to the care we provide our patients. We maintain the highest standards of quality by:

- Informing patients about the risks, discomforts and expected benefits of any procedure or treatment and of the availability of alternatives.
- Delivering personalized care and treatment.
- Communicating honestly with patients and only sharing information based on sound scientific evidence.

Clinical therapy and research are expensive, and pursuing them demands conscientious stewardship. City of Hope meets those challenges head-on: Financial considerations never dictate the quality of care offered to our patients.

## Treating Our Patients and Their Families with Respect and Dignity

*Hope with integrity means that we treat all patients with respect and dignity and only provide care that is both necessary and appropriate. We keep our patients, their families and patient representatives fully involved in all aspects of care and obtain informed consent for treatment.*

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, age, disability or sexual orientation. Clinical options are based on identified patient health care needs, not on cost or ability to pay.

We give each patient or patient representative a clear explanation of care, including diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, and advance directive options. We clearly understand our role in supporting our patients' fundamental rights.

## Confidentiality and Privacy of Patient Information

*We safeguard the privacy, confidentiality and security of our patients' personally identifiable information (PII) and other private data.*

Our patients trust us with their confidential and private information. Our reputation and the welfare of our patients depend on our ability to keep this vital information safe and secure. We ensure that we are only using and disclosing this information in accordance with applicable laws and City of Hope's policies.

To learn more, see Safeguarding Confidential Information.



### Hope with Integrity in Action

**Q** Leonard, who works in Medical Records, always looks forward to visits from Carole, the vendor for the department's coffee service. Carole is chatty and always smiling. On one visit, Carole mentions that she heard a famous actress was receiving treatment at City of Hope and asks whether she can look at the actress's record. Leonard figures Carole is just personally curious and wonders what the harm could be. Should Leonard let Carole take a peek?

**A** Absolutely not. This is against the law and a violation of our policies. Our patients' personal information and medical records have been entrusted to our care. We must never violate that trust. Leonard should deny Carole's request and should take care not to reveal, even indirectly, whether the famous actress is a patient at City of Hope. Leonard should also report Carole's inquiry (see Speaking Up and Seeking Help).

## Billing Practices

*Integrity and transparency are essential to everything we do, including patient billing.*

Patients have the right to examine and receive an explanation of their bills, regardless of the source of payment. Each patient, upon request, should receive a full disclosure statement of services and all charges for services provided by City of Hope. Patients who have questions about their bills may address their concerns to the Patient Billing Office.

The Financial Support Services Department works directly with patients who are facing financial hardships, including by connecting them with resources that may help them meet their financial obligations to City of Hope. As applicable, the department will also provide patients with information regarding City of Hope's internal financial assistance programs and discounts. It is important that we do not advertise our discounts or promise discounts to any patients who do not qualify for them under City of Hope policy.





# COLLABORATING WITH OUR HEALTH CARE PARTNERS

## Working with Medical Staff and Allied Health Professionals

*City of Hope's relationships with its many medical staff and allied health professionals are carefully structured to be in compliance with all legal requirements. These team members are critical to our mission and to our commitment to hope with integrity.*

These relationships are reviewed by the Office of General Counsel before approval. In order to ethically and legally meet all standards regarding referrals and admissions, we strictly adhere to three primary principles:

- We never pay or offer to pay anyone – employees, medical staff professionals, allied health professionals or other persons – for patient referrals. Violation of this policy may have grave consequences for City of Hope and those involved, including civil and criminal penalties and possible exclusion from federally funded health care programs.
- We never 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 allowed to give or receive anything of value, either directly or indirectly, in exchange for patient referrals. When we refer patients to other health care providers, we never take into consideration the volume or value of the referrals that the provider has made (or may make) to us.
- We never make referrals to another provider if we (or one of our family members) have a financial interest in that provider.

Those of us whose work involves gathering, processing or reviewing referral data should contact the Corporate Compliance Office to receive specialized training about the ways that this data may and may not be used.

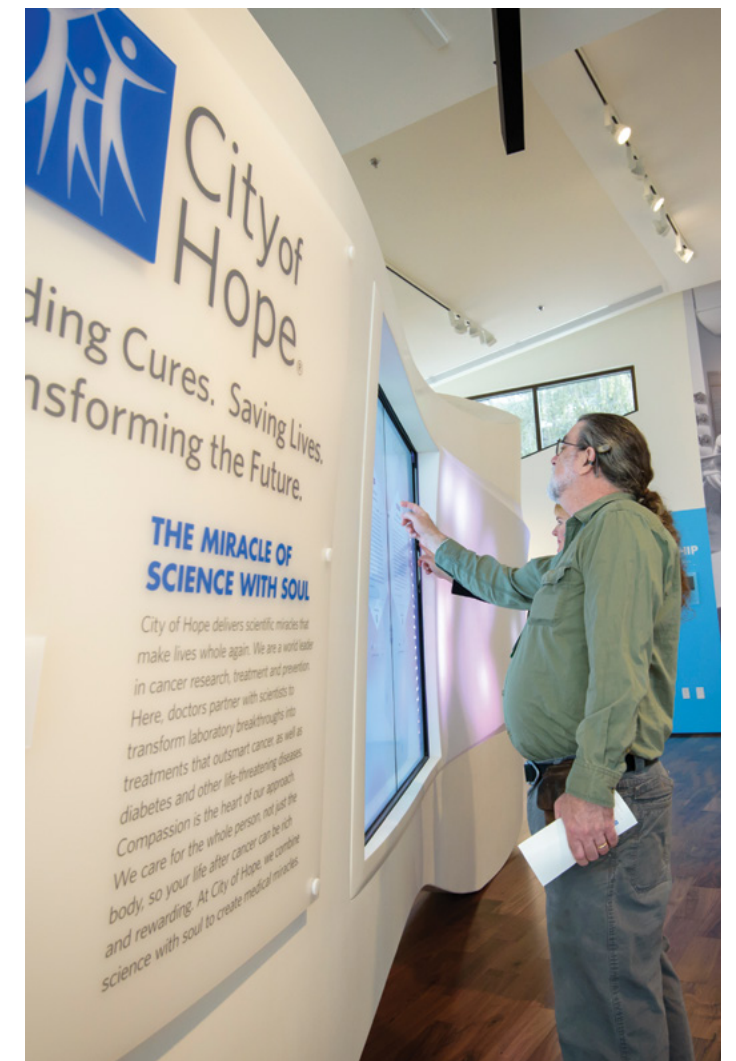
To learn more, see:

- [Incidental Medical Staff Benefits and Physician Non-Monetary Compensation policy](#)
- [Medical Staff Bylaws](#)
- [Medical Staff Rules and Regulations](#)

## Appreciating Volunteers and Donors

*Volunteers and donors are fundamental to making City of Hope's mission come alive.*

City of Hope's volunteers and donors are a huge part of the Miracle of Science with Soul. Because of them, we are able to meet the needs of our patients and their families. We recognize the value of our volunteers and donors. We make sure they know they are essential to our leading-edge science and compassionate, patient-focused care.





# Interacting with Accrediting Bodies

City of Hope interacts with all accrediting bodies in a direct, open and honest manner.

Ethics are always our focus when interacting with accrediting bodies. We never attempt to mislead an accreditor or its survey teams, either directly or indirectly. Compliance with rules and regulations is woven into our corporate culture, and this includes our work with accreditors. We aggressively self-govern and monitor our own adherence to requirements of the law and our accrediting bodies. All standards of accrediting bodies are important. They must be followed to the letter.

# Managing Subcontractors and Suppliers

We deal fairly and honestly with our subcontractors and suppliers.

Our subcontractors and suppliers are essential partners in helping City of Hope transform the future of health care. We manage our subcontractor and supplier relationships in a fair and reasonable manner. Our conduct is consistent with all applicable laws and good business practices. All of our subcontractors, suppliers and vendors are selected according to objective criteria. These include quality, technical excellence, price, delivery, promptness, service, reliability and ability to protect our confidential information.

- Hope with integrity means that in our relationships with subcontractors, suppliers or vendors, we:
- Never make purchasing decisions on the basis of personal relationships or friendships.
  - Never inappropriately disclose patient information or proprietary information.
  - Always follow the highest ethical standards when selecting sources, or awarding and administering contracts.
  - Never inappropriately communicate confidential information given to us by a supplier to a third party.
  - Never inappropriately disclose contract pricing and information to any outside party.
  - Never accept gifts or business gratuities that may be designed to impermissibly influence our business decisions.
  - Never require that our vendors make charitable gifts or contributions to us as a condition of doing business with us.

- To learn more, see:
- [Gifts, Gratuities and Business Courtesies policy](#)
  - [Vendor Relations, Fund-raising policy](#)
  - [Vendor Relations/Sales Representatives policy](#)
  - [Vendor, Use of Name or Participation of COH Patient, Employee or Physician policy](#)
  - [Vendor, Visitor, Observer in Treatment Areas policy](#)



# A JUST CULTURE FOR OUR COLLEAGUES







## Fostering a Respectful Work Environment

*We believe everyone is entitled to be treated with dignity and respect and to work in a supportive environment that is free from harassment.*

Being respectful in our interactions with colleagues and others is fundamental to the work we do and the kind of organization we want to be. Respectful work environments are more collaborative and innovative. We're proactive in recognizing and preventing harassment and threatening or violent conduct because doing so strengthens our connections and builds a safe, productive work environment. We don't tolerate any kind of illegal or improper harassment at City of Hope.

Hope with integrity means that we foster a respectful work environment by:

- Always treating one another with dignity and respect.
- Never saying or doing anything that others may find offensive or degrading.
- Always speaking up if we witness harassing or offensive conduct.

To learn more, see:

- [Harassment, Discrimination and Retaliation policy](#)

## What Does Harassment Look Like?

Harassment can be about what we say or write, whether it takes place in person or in electronic communications. Examples include:

- Using threatening, unprofessional or abusive language.
- Using racial, ethnic, gender-based or degrading slurs, jokes or stereotypes.

Harassment can be about what we do. Examples include:

- Touching someone without his or her consent.
- Intimidating someone.
- Making sexual advances or requesting sexual favors.
- Verbal or physical conduct of a sexual nature.
- Violence of any kind.
- Stalking.
- Blocking someone's path.

Harassment can be about what we display. Examples include:

- Posting sexually suggestive materials or potentially offensive slogans, posters or bumper stickers in or on City of Hope property.
- Posting sexually suggestive material on a computer screen at work.

When it comes to harassment, the issue isn't what we mean or intend by our words or actions but instead how others might perceive or react to them.

If we see or experience any form of harassment or violence, we immediately report the incident to a supervisor, the Security Department or Human Resources.

## Hope with Integrity in Action

**Q** Noora is a faculty member at the Graduate School. Reinaldo, one of her students, often stays after class to talk to her at length, often about personal matters. One afternoon, he begins to talk to her about relationships, sex and dating. Noora, clearly uncomfortable, changes the subject and then ends the conversation. Over the next few days, Reinaldo sends her several emails a day about personal matters and leaves a number of messages on her voicemail asking her to dinner. Two days later, as she is leaving the campus, Noora notices Reinaldo waiting near her car. She hurries back into the building. Noora wonders whether she should report Reinaldo's behavior as harassment because she is a faculty member and Reinaldo is a student. Should she report the matter?

**A** Yes. Noora is uncomfortable and concerned. City of Hope is committed to providing a safe, harassment-free workplace for everyone.



## Diversity and Inclusion

At City of Hope, we value our people for the great variety of talents, backgrounds and perspectives they bring. Diverse characteristics and experiences that make us who we are – how we are similar, as well as how we are unique – make us stronger together. By creating a workplace that is inclusive, where everyone feels able to participate and contribute, we are able to make better decisions, tackle challenges more creatively and innovate more effectively to achieve our goals.

Hope with integrity means that we foster diversity and inclusion by:

- Building our teams with diversity in mind.
- Sharing information and seeking input from all of our co-workers.
- Actively searching for different points of view to find solutions.
- Listening to the points of view of others with courtesy and respect.
- Speaking out if we feel our views or those of others are being disrespected.

## Equal Employment Opportunity

*We're committed to a policy of equal opportunity for all team members and applicants.*

Hope with integrity means that we make sure City of Hope is a welcoming workplace for all by:

- Never discriminating against or harassing any employee or applicant for employment because of race, color, creed, religion, national origin, sex, disability, age, marital status, sexual orientation, political affiliation, veteran status, and/or status with regard to public assistance.
- Always making employment decisions that are in compliance with federal, state and local laws.
- Extending this nondiscrimination policy to all employment practices, including benefits, compensation, discipline, hiring, promotion, separation and training.
- Supporting this policy and complying with all applicable laws prohibiting discrimination in employment.



# Keeping Our Workplace Safe, Secure and Healthy

*We all take responsibility for keeping ourselves and each other safe, secure and healthy in the workplace and protecting our visitors and communities from harm.*

Nothing is more important to us at City of Hope than keeping everyone safe, secure and healthy. Feeling safe and comfortable allows us to be more engaged and productive. It enables us to do our best work. We share a responsibility to be vigilant, follow procedures and speak up if something causes concern. Threatening or violent conduct is never tolerated, and no operational goal or measure is more important than staying safe.

Hope with integrity means that we keep the workplace safe, secure and healthy by:

- Never taking unnecessary risks in the workplace or directing anyone else to do so.
- Knowing and following applicable health and safety laws, regulations, rules, policies and procedures.
- Watching out for each other to avoid unsafe conditions or behaviors.
- Reporting any unhealthy or unsafe conditions or behaviors, especially workplace hazards, broken or missing equipment, or the presence of weapons on City of Hope property.
- Knowing what to do in case of injury or other workplace emergencies and cooperating during emergency drills.
- Never bringing illegal drugs or other controlled substances onto City of Hope property or being under their influence while at work.
- Talking to a supervisor if we are aware of any colleagues who may be under the influence of alcohol or drugs while at work.
- Trying to talk through disagreements calmly before they escalate.
- Reporting any threats of violence we experience or witness (including outside work and on social media).
- Calling the Security Department and, as appropriate, law enforcement in the case of imminent danger.

To learn more, see:

- [Alcohol-Free and Drug-Free Workplace Policy](#)
- [Workplace Violence Prevention Plan](#)
- [Emergency Operations Plan: Code Gray - Abusive/Assaultive Behavior](#)

# Security and Crisis Management

City of Hope’s ongoing commitment to product and workplace safety and environmental responsibility is very strong, but we must never become complacent. We must always be fully prepared for a crisis event, no matter how unlikely one may be.

We’re committed to emergency preparedness and to deploying crisis management plans when necessary. Our ability to act quickly and coordinate with others could make all the difference for the well-being of our co-workers, patients, visitors, volunteers and local communities.

Our commitment to hope with integrity means that we prepare for emergencies and crises by:

- Being visible and in charge if we have a leadership role.
- Recommending actions based on our core values and lessons learned by others in similar situations.
- Respecting the public’s right to know, especially in matters of risk to health and safety, within the boundaries established by the law.
- Owning up to our responsibilities.
- Communicating with transparency and with empathy for those affected by the situation.
- Working with relevant partners to bring a swift and safe conclusion to the situation.

# License and Certification Renewals

Those of us who are in a position requiring a professional license, certification or other credential are responsible for maintaining the current status of our licenses and credentials. We must be in full compliance with federal and state requirements applicable to our respective disciplines. City of Hope requires evidence that each license or credential status is current.

We don’t allow any employee, medical or allied health professional, or independent contractor to work without valid, current licenses or credentials.



ENGAGING PASSIONATELY  
IN OUR BUSINESS



# Protecting Our Interests

We take care of City of Hope's assets because they are the building blocks for our future, helping us better serve our patients, develop innovative treatments and turn hope into reality.

We avoid conflicts of interest – or even the appearance of a conflict – and act transparently in everything we do. As a result, we can make wise, unbiased decisions.

In the spirit of hope with integrity, we prevent actual or perceived conflicts of interest by:

- Staying alert for situations in which our personal activities, interests or relationships could interfere with, or be perceived to interfere with, our objectivity.
- Disclosing any financial interest in outside entities or corporations in accordance with our conflicts of interest policies.
- Recognizing situations where actual or potential conflicts may arise between City of Hope and its team members, patients or any other stakeholders.
- Disclosing to our supervisors or the Corporate Compliance Office any situation in which we believe a conflict exists between our personal interest and City of Hope's interest.
- Consulting the Corporate Compliance Office if we are unsure of whether a conflict of interest exists or how to proceed if it does.
- Completing all required disclosure forms promptly and comprehensively.
- Adhering to all City of Hope management plans put in place to manage conflicts of interest.
- Participating in all required City of Hope training related to disclosing and managing conflicts of interest.

To learn more, see:

- [Conflicts of Interest and Commitment: Disclosure, Identification, and Approval policy](#)
- [Institutional Conflicts of Interest in Research policy](#)
- [Public Health Service Financial Conflicts of Interest: Promoting Objectivity in PHS-funded Research policy](#)

## Hope with Integrity in Action

**Q** Thad is a researcher working with the Diabetes Complications and Metabolism team. He was recently asked to join a group of researchers who discuss new developments in diabetes research. After checking out the group, Thad discovers that it is funded by a drug manufacturer. He is concerned that joining the group could constitute a conflict of interest. Should Thad make others at City of Hope aware of the potential conflict?

**A** Yes. Working with this group might represent a conflict of interest. Thad should seek guidance from the Corporate Compliance Office on whether it would be appropriate for him to join the group.

## Preventing Insider Trading

We never use or share material, nonpublic information about City of Hope or any other organization for the purpose of buying or selling securities.

Our commitment to hope with integrity means that we help prevent insider trading and market abuse by:

- Never buying or selling shares in any publicly traded company when in possession of inside information.
- Never buying or selling shares until inside information about the relevant company or its securities becomes generally available and investors have had a chance to evaluate it.
- Not disclosing inside information to anyone outside City of Hope, including family members, relatives or friends.

To learn more, see:

- [Insider Trading and Disclosure of Non-public Information policy](#)

# Dealing Fairly and Honestly

We speak with pride, honesty and transparency about the value City of Hope brings to our patients and staff. Doing so builds trust and confidence in our brand.

We do business truthfully, accurately and fairly. All of our activities are based on the fundamental value of integrity, and we are dedicated to the dignity of the individual.

We deal fairly and honestly by:

- Always following the most ethical and honest marketing practices.
- Avoiding inappropriate conversations with our competitors (either directly or indirectly) about prices, terms, patients, co-workers, allied health professionals, suppliers or other competitors.
- Never making false claims about our competitors, advertising false information, describing our products and services in a misleading way, or otherwise engaging in unfair methods of competition and unfair or deceptive acts or practices.
- Never unfairly or wrongly gathering or misusing competitive intelligence.
- Never using our market strength or a competitor's confidential or proprietary information in any way that might unfairly harm free and open competition.
- Encouraging healthy competition with other organizations.
- Respecting the intellectual property of other organizations, businesses and individuals.
- Dealing fairly with all parties and avoiding any false or dishonest practices.
- Always behaving professionally during negotiations and treating everyone with respect.
- Never offering or accepting improper incentives, such as kickbacks, bribes or facilitating payments, and adhering to all applicable laws, including the physician self-referral law (the Stark Law) and the federal Anti-Kickback Statute.
- Accurately recording all payments to ensure City of Hope funds are never used for unlawful purposes.
- Engaging the Office of General Counsel or the Corporate Compliance Office to review any provisions in proposed contracts that involve free equipment, goods or services.
- Notifying our supervisor or the Corporate Compliance Office if we are concerned about potentially improper payments or incentives.
- Vigorously following the rule of law regarding antitrust activity.

## What Are Improper Incentives?

**Improper incentives** are any payments, gifts or other incentives offered, given or accepted to gain a business advantage. Some common examples are bribes, kickbacks and facilitating payments.

A **bribe** is a reward, advantage or benefit offered to influence and/or secure an improper business advantage or referral. A bribe is cash or anything of value. The amount of the bribe is irrelevant. A bribe is wrong even if it isn't actually paid.

A **kickback** is a form of bribe. An example of a kickback is a payment or receipt of a payment in return for securing a referral or contract.

A **facilitating payment** is a relatively small payment or gift to a government official or employee to expedite routine services or administrative actions. Facilitating payments should never be offered or made.

## Giving and Accepting Business Courtesies

We look for opportunities to build and strengthen relationships, but we never offer or accept inappropriate gifts or entertainment to influence decisions.

Much of City of Hope's success comes from the strong relationships we maintain with our patients and vendors. We always deal fairly with patients, co-workers and vendors and avoid offering or accepting gifts or invitations to entertainment that could inappropriately influence our business decisions or that could appear to do so. Gifts, even those that are well intentioned, could appear improper to others.

City of Hope has many vendors, and most of us interact with them in some way. Understanding our policies allows us to do business in the most efficient, cost-effective and compliant way, and it helps us make decisions that are best for City of Hope as an organization.

## Giving Gifts or Extending Invitations

Our commitment to hope with integrity means that when we plan to extend an invitation or give a gift to a non-industry business associate or co-worker, we keep it professional by:

- Ensuring that it is related to a clear business purpose and is not extravagant.
- Not doing so to secure an improper advantage or to inappropriately influence the recipient.
- Accurately documenting it in accordance with our expense procedures and having it approved in advance by a supervisor or director.
- Ensuring it is acceptable under our [Gifts, Gratuities and Business Courtesies policy](#).
- Encouraging the recipient to confirm that the gift is permitted under the recipient’s policies.
- Never doing so during a bidding, hiring or other decision-making process involving the recipient.
- Ensuring it is appropriate given the relationship and circumstances.
- Not giving cash, securities or loans.
- Making clear that the gift isn’t tied to any incentive or obligation to reciprocate.
- Never extending an invitation or gift to a federal, state or local government official or employee (see Doing Business with the Government).

### Hope with Integrity in Action

**Q** Jorie is organizing a City of Hope event at which four physicians will be speaking. She would like to give each speaker a customized pen to thank them for participating. The pens are valued at \$50 each. What steps must Jorie take to ensure that the gift is compliant?

**A** Jorie should contact the Corporate Compliance Office. City of Hope is subject to a federal annual limit that caps the value of items we can give to physicians. It is likely that the value of this gift will need to be tracked in an internal City of Hope database to ensure that it does not put any of the recipients over the federal cap. The Corporate Compliance Office can help Jorie track the item and train her so she can track future gifts independently.

- Checking with Human Resources to ensure that any gift we plan to give to a City of Hope employee (for example, as part of a raffle or giveaway where employees are eligible) does not exceed the maximum allowed value.
- Never giving items of value to patients or their family members unless designated to do so by City of Hope as part of an approved program for patients who have a demonstrated need for financial assistance.

Additional rules apply to gifts that City of Hope gives to current, past or potential referral sources. If our role involves giving items of value to physicians or other referral sources, we must contact the Corporate Compliance Office in order to receive special training.

## Receiving Gifts or Invitations

According to City of Hope’s [Gifts, Gratuities and Business Courtesies policy](#), different rules apply to giving and receiving business courtesies from industry sources, which include any pharmaceutical, medical device or biotechnology company. We are not permitted to give or receive any gifts or business courtesies, including nominal gifts such as food, from industry sources. The only exception is made for modest receptions or meals provided by industry sources in connection with educational meetings or conferences. In such cases, the meal or reception should be incidental and subordinate to the educational content of the meeting, modest in value, conducive to the discussion among those participating in the event, or led by those within the industry who are qualified to present a program that is aimed at promoting evidence-based medicine and scientific research.

We never request or otherwise solicit gifts or invitations. Accepting nominal gifts (e.g., valued at \$75 or less per person for non-industry gifts) or perishable or consumable gifts given to a department or group may be appropriate.

Our commitment to hope with integrity means that we avoid even the appearance of improper conduct when we are the recipient of a gift or invitation to entertainment by:

- Never soliciting gifts from patients, visitors, vendors or business associates.
- Never accepting cash, gift certificates, securities or loans.
- Never accepting a gift or invitation that feels like a “favor” or something we would feel obliged to reciprocate.
- Never accepting invitations to events of a purely personal nature, such as sporting events, concerts or theatrical events.

- Using good judgment and considering whether public knowledge of the gift or entertainment would harm City of Hope’s reputation.
- Declining gifts or invitations from vendors if we are involved in a bidding or procurement process with them.
- Asking for guidance from our supervisor if we are uncertain whether a gift or invitation is improper.
- Contacting the Corporate Compliance Office promptly for guidance if we are offered a gift from a physician or other individual or entity that is a past, present or potential source of patient referrals to City of Hope.

To learn more, see:

- [Gifts, Gratuities and Business Courtesies policy](#)
- [Incidental Medical Staff Benefits and Physician Non-Monetary Compensation policy](#)

### Hope with Integrity in Action

**Q** Chuma, who works in the Center for Cancer and Aging, has a warm friendship with Rob, a representative from an office-supply vendor. Chuma is currently in the process of reviewing a bid from Rob, as well as several other bids. When delivering supplies one afternoon, Rob stays to chat for a while and invites Chuma to join him for lunch. Chuma is tempted – he would like to go, and he enjoys Rob’s company – but he feels uncomfortable. Should he accept?

**A** No. Chuma’s instincts are on target: Rob’s invitation is inappropriate. The invitation may be completely innocent, but even the suggestion that Rob expects something in return will compromise the bidding process. Chuma should decline and explain City of Hope’s policies.

## Conducting Research Ethically

*Research is central to the Miracle of Science with Soul and is a core component of City of Hope’s mission.*

Hope with integrity means that we always follow the highest ethical standards in our research practices by:

- Adhering to all laws and regulations governing the conduct of research, including the review and approval of human subject research by our Institutional Review Board, the review and approval of animal research by our Institutional Animal Care and Use Committee, and other applicable regulatory committee approvals.

- Never tolerating research misconduct, including making up or changing results or copying results from other studies without performing the research or providing appropriate credit.
- Ensuring that human subjects involved in our research receive a detailed explanation of alternative services that might prove beneficial to them; are fully informed of potential discomforts; and understand the risks, expected benefits and alternatives.
- Fully informing research subjects of the procedures to be followed, especially in cases that are experimental in nature.
- Making sure subjects understand how their medical information will be used and disclosed in any research in which they participate.
- Making sure that a patient’s refusal to participate in a research study doesn’t compromise his or her access to services.
- Always maintaining the highest ethical standards in any written or oral communications regarding research projects.
- Following all appropriate research guidelines to the letter.
- Submitting only true, accurate and complete costs related to research grants.
- Ensuring that research is free from any conflicts of interest or even the appearance of conflicts of interest.

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, the Institutional Official for Research or, when applicable, the director of City of Hope’s Human Research Protection Program.

To learn more, see:

- [Clinical Research policy](#)
- [Basic Research Handbook](#)
- [HRPP SOP Manual](#)
- [PHI – Uses and Disclosures of Protected Health Information for Research policy](#)



## Product Safety and Quality

*City of Hope's reputation, and that of our staff, demands that we all share the responsibility for the safety and quality of the drugs, products and equipment we use and the services we provide.*

Hope with integrity means that we always ensure the drugs, products and equipment we use are safe by:

- Undergoing an extensive value analysis process and obtaining approval for use before purchasing or using any new product or equipment.
- Accurately disseminating and acting upon any product or drug alerts and recall notices we receive.



- Properly maintaining all documents and records regarding product or drug alerts and recalls.
- Ensuring that all patients receive full disclosure of any relevant product or drug alerts and recalls.
- Promptly and properly removing from service or disposing of any recalled products, equipment or drugs.

## Doing Business with the Government

*We recognize that doing business with local, state and national governments is both an honor and a privilege, and we embrace the special responsibilities that this business involves.*

Hope with integrity means that we maintain ethical business practices with government entities by:

- Complying with all relevant government procurement laws, regulations, policies and processes, including those related to participation of small, women-owned, minority-owned or veteran-owned businesses in public contracts.
- Never submitting documents that are false or fictitious.
- Making sure that pricing and invoicing records are always accurate and truthful.
- Never offering anything of value to government officials or employees of state-owned entities and never appearing to collude improperly with vendors or competitors on any government business.
- Ensuring any certifications that we provide are accurate, complete and truthful.

To learn more, see:

- [Corporate Compliance Plan](#)



**STRIVING FOR  
EXCELLENCE IN  
OUR INSTITUTION**



# Using Information Systems and Other Resources Responsibly

We rely on our information systems and other resources in providing our innovative care. Hope with integrity means we use our resources responsibly and in support of City of Hope’s values and mission.

Our mobile devices, computers, computer networks, phones, copy machines and other equipment are vital assets. They allow us to work together on our urgent goals. They help us keep information secure when we use them properly. Our City of Hope resources are essential to our work, so we ensure that they aren’t damaged, lost or compromised.

We use City of Hope systems, devices, supplies, materials, equipment and information responsibly by:

- Remembering that they are intended for business use and limiting our personal use of them.
- Making sure only authorized users can access our computers and networks.
- Securing our devices both on and off City of Hope premises.
- Giving authorized users access only to the systems and information they need to do their jobs.
- Using strong passwords and never sharing our user IDs or passwords with others.
- Never opening suspicious email attachments, clicking on questionable hyperlinks or entering our credentials in such links.
- Never using systems or devices to access, store or send improper content – for example, threatening, libelous or obscene material.
- Promptly reporting any possible breaches so they can be addressed.
- Recognizing that our email, voicemail and computer files aren’t private. City of Hope reserves the right to access them and to monitor our activity on City of Hope resources.

To learn more, see:

- [Acceptable Use Policy](#)

## What Is a Breach?

A **breach**, or data breach, occurs when someone who is not authorized to do so accesses and/or discloses sensitive, protected or confidential information.

## Hope with Integrity in Action

**Q** Patrick is the secretary for the Parent-Teacher Association at his children’s grade school. During his break time, he uses his City of Hope email account to write up the minutes from last month’s meeting and send them to all PTA members. He also stores the minutes from previous meetings on his work computer. Is this acceptable?

**A** No. Our resources must be used primarily for City of Hope business. Sometimes we may need to make very limited personal use of City of Hope resources, but Patrick’s actions exceed limited personal use.

## Managing Our Records, Reports and Data

We are all responsible for the integrity and accuracy of our documents and records and for managing them effectively.

Hope with integrity means that we manage our records effectively and ensure the integrity and accuracy of our documents and records by:

- Identifying, maintaining, retaining, safeguarding and disposing of all medical and business documents and records in accordance with City of Hope’s records retention policy and all applicable laws.
- Ensuring records are easily accessible and maintained in an organized and secure environment.
- Never selectively editing or discarding records that haven’t met their retention requirements or directing anyone else to do so.
- Complying with any document preservation or “hold” notices received from the Corporate Compliance Office or the Office of General Counsel.
- Providing complete and accurate reports and records promptly if they are requested in connection with an audit or investigation.
- Working hard each day to ensure we follow all regulatory and legal requirements.
- Ensuring that records are available to defend our business practices and actions.
- Never altering or falsifying information on any record or document.
- Never tampering with documents or records or removing or destroying them prior to the specified date.

To learn more, see:

- [Records Retention, Storage and Destruction policy](#)

## What Are Medical and Business Records?

City of Hope medical and business records include:

- Paper-based information, such as letters, memos, bills, invoices and reports.
- Electronic information, such as email or other computer files on disk, tape, USB flash drives, external hard drives or any type of backup service, including the cloud.
- Any other document or medium that contains information about City of Hope or its business activities.

## What Is a City of Hope Record?

City of Hope records can include:

- Medical records.
- Correspondence, including memoranda, letters, emails (including attachments), social media posts and text messages.
- Policies and procedures.
- Purchase orders and invoices.
- Contracts.
- Reports, analyses, formulas, schedules, tables, presentations and financial models.
- Personnel files.
- Production reports.

## Safeguarding Confidential Information

We secure and protect the confidential and private information and intellectual property of City of Hope, our patients, our co-workers and our business partners.

Information is a valuable asset. Our critical information drives our research and enables our care. Protecting our information allows us to lead the way in delivering innovative, patient-focused care. We do this by carefully managing and storing confidential information and by protecting it from improper or unauthorized disclosure.

Hope with integrity means that we protect confidential and private information and intellectual property by:

- Only using secure means when faxing, mailing, emailing or otherwise transmitting confidential information outside City of Hope.
- Never discussing confidential information in areas where others may overhear.

- Never making confidential information visible to others or susceptible to theft (such as when working on a laptop during a flight or accessing an unsecured Wi-Fi network).
- Never sharing passwords with anyone else, not even a supervisor, IT personnel or other higher levels of management.
- Always logging off computer applications that contain patient or other sensitive information when not in use.
- Never disclosing confidential information that violates the privacy rights of our patients.
- Ensuring that no City of Hope medical or allied health professional staff member, employee or volunteer may access any patient information other than that which is necessary to perform his or her job.
- Only sharing confidential information with people who are specifically authorized to access it.
- Never using or attempting to use confidential information for personal gain.
- Immediately contacting the privacy officer if we receive a request or demand for information from any state or federal agency, whether it concerns City of Hope or a patient, vendor, business partner, staff member, volunteer, or any other person or entity.
- Properly classifying all documents.
- Never removing documents that contain confidential information from the premises unless the activity has been approved by management and/or the Corporate Compliance Office and appropriate security measures have been implemented.
- Only collecting and using protected health information (PHI) and personally identifiable information (PII) as required by law or to conduct business effectively.
- Storing safely and never sharing PHI or PII outside City of Hope, except as required by law.
- Never infringing on others’ copyrights, patents, trademarks, trade secrets or design rights.
- Following the specific license terms of all third-party assets.
- Only using software for which we have a business-use license.
- Following all privacy, data protection and intellectual property laws that apply to us.

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

To learn more, see:

- [PHI – Confidentiality of Protected Health Information policy](#)
- [PHI - Fax Use and Fax Transmittals of PHI](#)





## Hope with Integrity in Action

**Q** Michael, who works in Medical Records, receives an email from a representative from the Department of Public Health who is seeking medical records for a patient. He becomes suspicious as he reads the email. There are many misspelled words in the message, including the word “doctor.” Michael refers the matter to his supervisor and the privacy officer. Is he overreacting?

**A** No. It is possible that the sender is posing as a health official to steal information. The incident should be investigated. Michael’s reaction is entirely appropriate and should be encouraged.

## What Are Some Examples of Confidential Information?

Confidential information includes:

- Medical records.
- Medical record numbers.
- Patient names.
- Patient PHI, including diagnoses, test results and dates of services.
- Nonpublic financial information, including strategic pricing, costs and promotion strategies.
- New-product and marketing plans.
- Supplier lists, quotes, bids and contracts.
- Information concerning City of Hope and the businesses it partners with.
- PII belonging to our patients, co-workers, vendors or business partners. PII can include:
  - o Addresses.
  - o Email addresses.
  - o Credit card numbers.
  - o Driver’s license or passport numbers.
  - o Social Security numbers.
  - o Birthplace information.
  - o Dates of birth.
  - o Telephone numbers.
  - o Photographs.
- Donor lists.
- Pricing and cost data.
- Financial data.
- Plans to sell, acquire or merge businesses.
- Research data.
- Marketing strategies.
- Credit cardholder information.
- Supplier and contractor information.
- City of Hope intellectual property.
- Intellectual property of others.

To learn more, see:

- [Information Security Data Classification & Handling policy](#)
- [PHI – Confidentiality of Protected Health Information policy](#)

## Preventing Fraud, Waste and Abuse

*Hope with integrity means that we remain vigilant in our efforts to curb fraud, waste and abuse.*

City of Hope’s [Corporate Compliance Plan](#) is designed to prevent fraud, waste and abuse by fostering a culture that promotes prevention, detection and resolution of conduct that is in violation of laws, regulations and City of Hope policies.

Hope with integrity means that we prevent fraud, waste and abuse by:

- Responsibly tracking and reporting our costs and expenses.
- Maintaining internal processes that minimize waste and maximize efficiency.
- Ensuring that all services we provide are medically necessary.
- Accurately and completely documenting all services.
- Coding and billing all services comprehensively and in compliance with all rules and regulations.
- Never billing for services that were not provided.
- Never inaccurately inflating the level of service to make it appear as if we provided a higher level of service than what was actually provided.
- Staying up to date on any changes in coding or billing rules.
- Raising any concerns about clinical, coding or billing practices promptly.
- Cooperating with any audits or compliance investigations.
- Promptly instituting appropriate corrective actions when a problem is identified.
- Making the necessary disclosures, reports or refunds to third-party payors under the direction of the Corporate Compliance Office or the Office of General Counsel.

To learn more, see:

- [Corporate Compliance Plan](#)

## Partnering with Third-Party Payors

*We ensure that all billing to government and private insurance payors is honest and accurate, and we follow all federal and state laws and regulations.*

Trust is critical to our mission. We earn the trust of our patients, their families, our partners and the community by always being honest. We never make claims for payment or approval that are false, fictitious or fraudulent.

Our commitment to honesty and fairness means that we ensure all claims submitted are only for services that were actually provided and that services are billed as provided. As such, it is critical that the documentation of our services is complete and accurate.

We take care to ensure that any billing or coding subcontractors who work on behalf of City of Hope have the necessary skills and understand the quality assurance processes, systems and appropriate procedures to ensure that all billings for government and private insurance programs are accurate and complete. We work only with billing and coding organizations that are committed to the same standards of integrity that we uphold.

To learn more, see:

- [Medical Staff Bylaws](#)
- [Medical Staff Rules and Regulations](#)

## Cost Reports

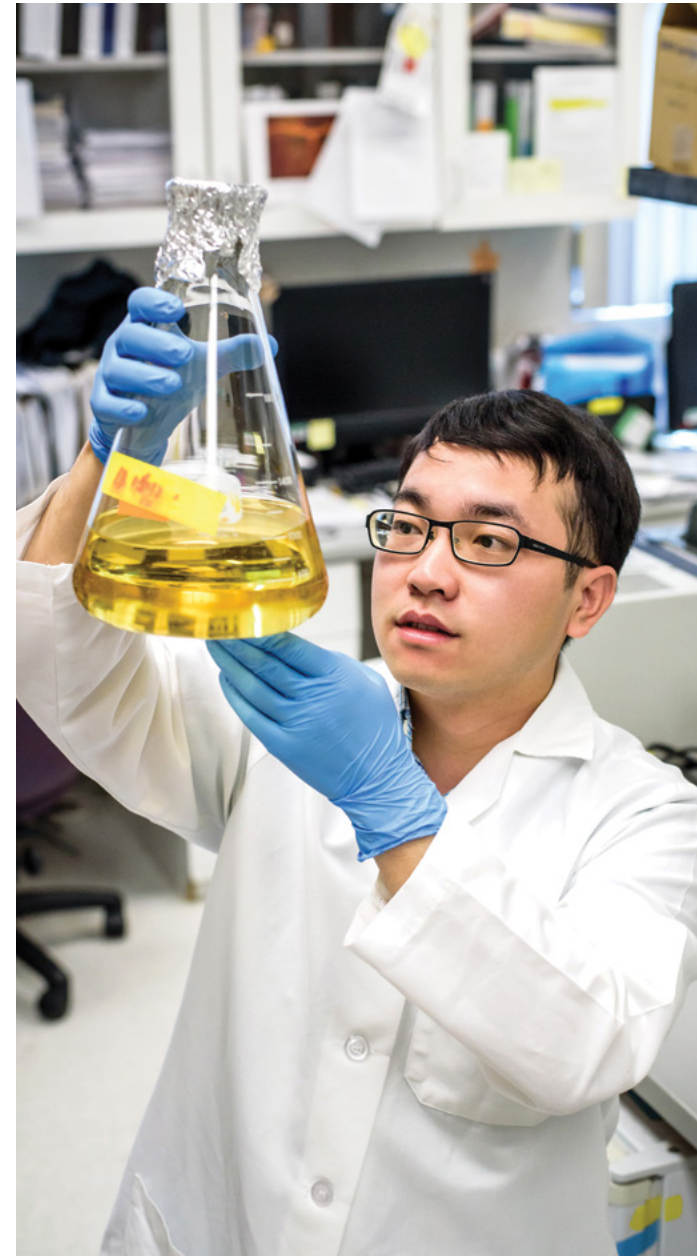
Much of our work involves reimbursement by government programs. For these programs, we must prepare certain reports on our costs and operations. We always ensure full compliance with federal and state laws relating to all cost reports. These laws and regulations define what costs are allowable and outline how we can claim reimbursement for the costs of services provided to program beneficiaries. We communicate through or coordinate with the Finance Department on all issues related to the completion and settlement of cost reports.







# DOING WHAT IS RIGHT FOR OUR COMMUNITIES



## Protecting the Environment

*At City of Hope, we take responsibility for minimizing our environmental impact.*

Hope with integrity means that we contribute to City of Hope's sustainable practices by:

- Following all applicable environmental laws and City of Hope environmental policies.
- Carefully handling and properly disposing of all hazardous and biohazardous waste, including medical waste.

- Immediately informing a supervisor about any spill, leak or discharge of a hazardous substance; improper disposal of medical waste; or other situation that could damage the environment.
- Maintaining all necessary permits, approvals and controls.
- Following City of Hope plans and procedures for waste management and recycling.
- Understanding how our job duties may impact the environment.
- Taking small, practical steps every day – turning off unwanted lights, setting thermostats appropriately, not idling engines – that add up over time to cut emissions and reduce water, fuel and electricity consumption.

## Contributing to Our Communities

*We're committed to supporting the communities where we live and work while also helping to address broader challenges in the communities where we operate.*

Hope with integrity means that we contribute to our local communities and society in general by:

- Working closely with collaborative partnerships and other philanthropic organizations.
- Volunteering and participating in charitable activities in our communities.
- Always obtaining proper approval before donating City of Hope funds or making contributions in the name of City of Hope.
- Ensuring that outside activities don't interfere with our job performance or create a conflict of interest.
- Never pressuring others to contribute to charitable organizations or other community activities.

## Handling External Inquiries

*We realize that every communication with the media, the public, or potential or current donors is an opportunity to showcase our mission and values.*

City of Hope's Media Relations team works with national, regional and local news media to inform the public about our medical and scientific advances, events and other notable news. Any external inquiries about City of Hope from news organizations should be referred to the Media Relations team.

To learn more, see:

- [News Media policy](#)





## Responsible Use of Social Media

*We embrace the power of social media to build connections and express our points of view while always taking care not to share information or opinions that could hurt City of Hope’s reputation.*

Social media is a powerful tool, so we always use good judgment when we express ourselves online. We never represent City of Hope on social media unless authorized to do so, and we are careful not to share information or opinions that could harm City of Hope’s reputation.

Hope with integrity means that we show care when using social media by:

- Being thoughtful, appropriate and respectful when posting online because we are responsible for what we say and share.
- Never posting false or misleading information about City of Hope or its employees, vendors or other business partners.
- Never sharing confidential patient information or photographs of patients on social media.
- Not using social media during working hours or on equipment provided by City of Hope unless such use is work-related.
- Making sure all postings or sites related to City of Hope are consistent with City of Hope’s

policies and practices concerning ethics, confidential information, discrimination and harassment.

- Never representing our personal views as those of City of Hope.

To learn more, see:

- [Acceptable Use Policy](#)
- [Guidelines for Employees in Social Media](#)

### Hope with Integrity in Action

**Q** Alyana has numerous Facebook friends who are also her colleagues at City of Hope. One of her friends, who works in the Laboratory Outreach Department, posts a photo he took in one of the labs. His caption for the post includes a joke that Alyana finds somewhat offensive. She studies the picture carefully but doesn’t see anything that includes confidential patient information or that could otherwise compromise data privacy. Still, she feels unsettled. Should Alyana say something about her colleague’s post?

**A** Yes. The post, which features City of Hope premises, is likely inconsistent with City of Hope’s social media guidelines and should be reported.

## Participation in the Political Process

*We encourage active participation in the political process, which can make a positive difference in our lives and our communities. As a nonprofit organization, we engage constructively with all governments in the regions where we operate.*

We believe that an open and robust political process makes for a fairer, more efficient and more productive society. We also support every employee’s right to express his or her personal beliefs and participate actively in the political process.

However, we shouldn’t use our time on the job or City of Hope resources for our personal political activities. We don’t want others to think that City of Hope supports our personal causes, as this could damage our brand and reputation.

We engage in the political process as a corporate citizen. Wherever we do business, we work with our supervisor, the Office of General Counsel or the Corporate Compliance Office to ensure we comply with local campaign finance and election laws.

If we engage with legislators or government agencies, we are scrupulous in following the laws on lobbying and never try to “buy influence.”

Whether participating in the political process as individuals or as an organization, or engaging with governments, there are certain standards we must follow.

### Personal Political Activity

Each of us has the right to participate in the political process and engage in civic activities, including holding political office.

Hope with integrity means that we participate in politics responsibly by:

- Always making it clear that our political views and actions are our own and not those of City of Hope.
- Conducting all political activities on our own time, away from work and at our own expense.
- Informing the Corporate Compliance Office if we decide to run for political office to avoid any potential conflicts of interest.

## Corporate Political Activity

As a nonprofit organization, we always comply with federal, state and local political campaign finance and election laws. We never make any direct or indirect political contribution or expenditure on behalf of City of Hope without advance approval by the Office of General Counsel. Any use of corporate facilities for fundraising activities during working hours is prohibited.

### Lobbying

We never use improper means in attempting to influence government agencies, representatives or legislators to produce an outcome that is favorable to City of Hope.

While lobbying is a legitimate activity for achieving political and civic change, it must always be done in accordance with applicable laws. Hope with integrity means that we:

- Follow all applicable rules regarding public disclosure and all reporting requirements related to lobbying activities on behalf of City of Hope.
- Communicate with legislators, senior regulatory officials, executive branch officials or their staff only if authorized to do so on City of Hope’s behalf.





# Our Corporate Compliance Plan – Striving for Excellence

The laws governing health care and medical research are constantly evolving and increasingly complex. City of Hope has established a Corporate Compliance Plan to ensure compliance with applicable laws and to prevent fraud, abuse, waste and other noncompliant behavior. The plan clearly defines the compliance standards for City of Hope board members, medical and allied health professional staff members, employees and volunteers. Our Corporate Compliance Plan is comprehensive and based on the elements of an effective compliance program as outlined by the U.S. Sentencing Commission and the U.S. Department of Health and Human Services Office of Inspector General.

To learn more, see:

- [Corporate Compliance Plan](#)

# Annual Code Acknowledgment

We acknowledge and understand our responsibilities and personal commitment to City of Hope’s mission and values.

When we join the City of Hope team, and each year afterward, we sign an acknowledgment confirming our receipt of this Code of Conduct. Our signature verifies that we understand City of Hope’s mandatory policies for ethical conduct and that we will adhere to the principles outlined in this document. We understand that our adherence to these policies is considered in all hiring, promotion and compensation decisions.







**Corporate Compliance Program**

1500 E. Duarte Road  
Duarte, CA 91010-3000  
[CityofHope.org](http://CityofHope.org)

Corporate Compliance and Human Resources Hotline: 877-COH-COH8 (264-2648)