



Cedars-Sinai Health System and its affiliates (“CSHS”) value our relationships with vendors and the importance of maintaining effective and working relationships. We maintain the highest standards of business ethics and use our best efforts to comply with all federal, state, and local laws and regulations. We are committed to preserving the integrity of business decisions by treating all vendors and potential vendors impartially, and by avoiding conflicts of interest that may bring into question whether a decision was made for Cedars-Sinai’s benefit.

Consistent with the foregoing, Cedars-Sinai has developed Standards of Conduct that extend to our business relationships with vendors. We expect our vendors to adhere to these Standards.

As a CSHS partner, you are expected to:

- Adhere to the Standards of Conduct when doing business with CSHS.
- Report any suspected, observed, or known violation of law or regulation to the Corporate Integrity Department of CSHS at CorporateCompliance@cshs.org.
- Disclose all potential conflicts of interests related to CSHS and avoid those conflicts that, in the judgment of a reasonable and objective observer, would give the impression or perception of impropriety.
- Understand that our workforce cannot accept any gifts, gratuities, and offers of entertainment from vendors and potential vendors. This includes, but is not limited to:
 - Personal gifts
 - Free meals and offers of entertainment (e.g., tickets to sporting events, concerts, etc.,)
 - Compensation, or any other forms of gratuity, including reimbursement for travel-related costs for attending a professional conference or sponsored event; and
 - Donations or sponsorships to personal charities that benefit the workforce member personally

In light of this policy, please refrain from offering or sending gifts, gratuities, and offers of entertainment to Cedars-Sinai workforce members. While we understand that vendors sometimes seek to express their appreciation for Cedars-Sinai’s business through gifts, the best way for vendors to show their appreciation is by continuing to provide high-quality goods and excellent and reliable services.

Thank you for your partnership and for your commitment to Cedars-Sinai. We appreciate you taking the time to review our Standards of Conduct.



Standards of Conduct



The work of Cedars-Sinai requires the trust of many people: patients, the community, regulatory agencies, payers and each other. We must earn and maintain that trust every day. We accomplish this by adhering to the highest standards of integrity and ethics in all that we do, and by complying with the letter as well as the intent of all applicable laws.

“Cedars-Sinai” refers to Cedars-Sinai Medical Center, Cedars-Sinai Medical Care Foundation, Cedars-Sinai Marina del Rey Hospital and other affiliates that are part of the Cedars-Sinai family.

The standards set forth in the Standards of Conduct apply to Cedars-Sinai:

- Employees (including faculty)
- Medical Network physicians
- Medical staff
- Workforce members provided by staffing agencies
- Students and trainees
- Volunteers
- Members of our board of directors and other governing bodies
- Independent contractors
- Vendors and suppliers

Cedars-Sinai expects all individuals who provide services at Cedars-Sinai facilities to adhere to the guiding principles and standards reflected in these Standards of Conduct. Cedars-Sinai recognizes that affiliated medical staffs and peer-review bodies may maintain their own codes of conduct and related policies that specifically apply to physicians and other practitioners.

A violation of the Standards of Conduct—or of any Cedars-Sinai policy—may result in disciplinary action, up to and including termination for employees, volunteers or trainees; medical staff review and action; or contract termination.



Standards of Conduct

Built upon Cedars-Sinai's core values, these Standards of Conduct have been developed to guide how we do our work and the integrity of our actions. These standards may not address every question you might have, as more specific information is available in detailed policies and procedures on specific topics. If you have questions that are not addressed by this document or the policies that support it, please contact your supervisor or the Corporate Integrity Office.

Integrity in Our Care

Quality of Care and Patient Rights

We are committed to providing quality healthcare and services to our patients, their families, visitors and the community. We treat everyone with the same high level of respect and dignity, providing care that is both necessary and appropriate.

We inform patients of care plans and alternatives, involve them with decisions, ensure that they are providing informed consent and allow them to refuse care, to the extent permitted by law. To the extent of our capabilities, clinical care is based on identified patient healthcare needs, not on patient or organization finances.

Confidentiality of Patient Health Information

We keep our patients' Protected Health Information (PHI) confidential, private and secure. We understand our responsibility to comply with applicable law and our own policies that protect the confidentiality and security of PHI.

As part of our work, we may have access to information about our patients, such as medical conditions, history, diagnosis, family illnesses and financial information. We only review, share or discuss this information on a need-to-know basis in order to perform our job duties.

Sharing PHI with anyone who does not need to know it for that patient's care is strictly prohibited. This includes any type of information (words or pictures) in any communications channel (spoken directly or written, or via any other channels, such as social media, email or texting) that may intentionally or unintentionally enable someone to identify a patient.

Licensing and Certification

We expect that our caregivers follow all standards of professionalism established by their respective licensing boards and that our caregivers are able to perform their work duties within the scope of their licenses, certifications or other professional standing. Cedars-Sinai does not knowingly employ or contract with individuals or organizations that are ineligible to perform work related directly or indirectly to federal healthcare programs.

Reporting Adverse Events

We encourage everyone to immediately report any adverse event or potential harm involving a patient, using the appropriate mechanisms at Cedars-Sinai. As with any other good-faith reporting of a possible Standards of Conduct violation, you will be protected from retaliation.

Integrity in Our Workplace Conduct

Honesty

Our patients, the public and payers place a unique trust in Cedars-Sinai. It is essential that you uphold that trust by always being honest. Tell the truth, be straightforward (not misleading), and if you see someone else acting dishonestly, report that as you would any other violation of the Standards of Conduct. When we make a statement or sign our names to any document, we are confirming that it is true. We do not sign other people's names to documents, and we do not share passwords with our colleagues.

Mutual Respect

A climate of mutual respect brings out the best in all of us. In such an environment, we can feel safe (psychologically and physically), disagreements can be discussed and resolved respectfully and openly, and the diversity of our workforce, our patients and our community can be celebrated. At Cedars-Sinai, we show the same high level of respect to everyone.

Harassment and Bullying

We value and respect the diverse backgrounds and cultural characteristics of our fellow staff, our patients and the communities we serve. Harassment and bullying in any form—verbal, physical or visual—is prohibited. We do not engage in or tolerate any behavior that creates an intimidating, hostile or offensive work environment, such as gender or cultural bias, degrading or humiliating jokes or slurs, unwelcome sexual advances, requests for sexual favors in conjunction with employment decisions, any verbal or physical conduct of a sexual nature that creates an intimidating, hostile or offensive work environment or any other form of sexual harassment.

Fairness and Equal Employment Opportunity

We are committed to providing an equal opportunity work environment where everyone (employees, patients, medical staff, students, volunteers, visitors and others) is treated with fairness, dignity and respect. We do not allow discrimination based on race, creed, color, gender, gender expression and identity, sexual orientation, national origin, ancestry, religion, age, marital status, veteran status, disability or any other basis prohibited by federal, state or local law. Please see the HR Service Center website for our complete Equal Employment Opportunity Policy.

Workplace Violence

We are committed to a violence-free work environment, protecting the safety of our patients and staff. We do not tolerate any violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to Cedars-Sinai.

Substance Abuse

Everyone is expected to report to work free from the influence of legal and illegal substances that could impair their ability to do their job, including alcohol, marijuana, illegal drugs and certain prescription drugs. Reporting to work under the influence of any of these substances, having an illegal drug in your system, or using, possessing or selling illegal drugs may result in disciplinary action, including immediate termination from employment, program or contract, or medical staff review and action.

Health and Safety

We follow all applicable laws and our own policies that promote health and safety in the workplace. You should be familiar with—and understand how—these laws and policies apply to your specific responsibilities, and where to report any situation posing a danger of injury.

Integrity in Our Research and Education

Cedars-Sinai is committed to the highest ethical standards in our research and education. We adhere to all laws governing the conduct of research, including requirements related to the review and approval of human subjects research by our Institutional Review Board, the review and approval of animal research by our Institutional Animal Care and Use Committee and other applicable approval requirements.

All patients asked to participate in research will be given a full explanation of the risks, expected benefits and alternatives, as well as the procedures to be followed, especially those that are experimental in nature.

We do not tolerate research misconduct, such as fraud, plagiarism or inaccurate financial reporting for research grants. Report any actual or suspected incidents of research misconduct to the Research Integrity Officer.

If you are applying for or performing research of any type, you are responsible for maintaining the highest ethical standards in any written or oral communications regarding your research projects, as well as for following appropriate research guidelines.

Cedars-Sinai's detailed policies regarding research and education can be found in the Policy and Procedure Manager (PPM).



Integrity in Our Business Relationships

Billing, Coding and Documentation

We submit accurate bills and bill only for services that were actually provided, properly documented and coded. We comply with all laws and third-party payer requirements that govern billing, coding, documentation and submitting claims for payment. If you see a billing error—whether made by you or someone else—you must investigate and correct the error prior to submitting the bill. If you have already billed, the error must be immediately corrected, and appropriate refunds made. If you are not sure how to correct the error, contact your supervisor, Revenue Cycle department leadership, the Corporate Integrity Office or the Compliance Hotline.

The Federal False Claims Act and other laws protect government programs, including Medicare and Medicaid, from fraud and abuse. Cedars-Sinai complies with these laws and has policies to detect, report and prevent waste, fraud and abuse, as well as provide protection for whistleblowers.

Conflicts of Interest

We conduct business in an honest, fair and transparent manner, and in the best interest of Cedars-Sinai and our patients. A conflict of interest may occur if a person's outside activities, business interests, personal interests or family interests influence, could influence or appear to influence their ability to make objective decisions or take actions for the benefit of Cedars-Sinai. You should never use your position at Cedars-Sinai, or any Cedars-Sinai resources, to: (a) obtain favored treatment from an individual or organization for yourself, family members or others with whom you have a significant relationship; or (b) provide favored treatment (or the appearance of favored treatment) to a family member or others with whom you have a significant relationship.

Avoid any activities that may involve (or may appear to involve) a conflict of interest. If you are in a situation where there may be even an appearance of conflict, you must disclose it to the appropriate person, per the respective policy.

Business Courtesies (Gifts, Gratuities and Entertainment)

Although entertaining customers and exchanging gifts may be customary practices in other sectors, in healthcare we are in a unique position of trust. Our patients and community members need to know that the work we do is not influenced in any way by gifts or other offers from the people and companies with whom we interact. We communicate to vendors, physicians, patients, customers and others that our values restrict what we can give and receive because we want our services and business relationships to stand on their own. Occasionally, you might be offered a small gift or other token of appreciation from a grateful Cedars-Sinai patient or a Cedars-Sinai donor. Any permitted business courtesies provided or received must be reasonable and small enough that they do not influence our decisions. Cedars-Sinai's detailed policies regarding business courtesies and gifts can be found in the Policy and Procedure Manager (PPM).

Financial Reporting

We are committed to fair, accurate, complete and timely financial and other data reporting. Our reporting should not be misleading in any way. Cedars-Sinai's officers and management maintain a system of internal controls designed to provide reasonable assurance that the organization meets its financial and other data reporting obligations and objectives. We cooperate fully and transparently with internal and external auditors and any regulatory agencies that examine our records.

Political Activities and Contributions

As a nonprofit, tax-exempt organization, Cedars-Sinai's political participation is limited by law. Cedars-Sinai's funds or resources may not be used to contribute to candidates, political parties or any affiliated organizations. Such resources include financial and non-financial donations (such as using work time and phone calls to solicit for a political party or candidate, or the loaning of Cedars-Sinai's property for use by a candidate or political party campaign).

Government Audits, Investigations and Accreditation Processes

Cedars-Sinai is subject to regular and extensive oversight by local, state and federal governments and accreditation agencies, law enforcement authorities and external auditors. You are expected to be truthful, cooperative and transparent whenever submitting a regulatory filing or certification or responding to inquiries from the Corporate Integrity Office, Legal Affairs Department or an external regulator's or surveyor's inquiry.

If you receive any summons, subpoena, inquiry, investigative demand or other communication from a court, law enforcement official, government agent or any outside lawyer regarding Cedars-Sinai matters (as opposed to personal matters relating to you as an individual), immediately contact your supervisor, or a member of the Risk Management Department or the Legal Affairs Department.

Record Maintenance and Retention

We retain documents, emails and other communications for the length of time described in Cedars-Sinai's business records management and patient medical record policies. Everyone is responsible for the integrity and accuracy of our organization's documents and records. You may not falsify information on any record or document. If you observe or have knowledge of someone else submitting false or inaccurate documents or records, you are expected to report that as a possible Standards of Conduct violation.

Referrals of Care and Service

We comply with the laws that regulate patient referrals to other providers, facilities, suppliers and health plans, such as the Federal Anti-Kickback and Self-Referral ("Stark") laws.

- We prohibit our employees, medical staff, contractors and their representatives from offering, providing, requesting or receiving anything of value (directly or indirectly) with the intent to influence patient referrals or other business. For example, we do not permit inducements or incentives for patients to access services at Cedars-Sinai. Direct

payments might include a commission, rebate, bribe or kickback (whether to the employee or physician or to one of their family members). Indirect payments include anything of value, such as the use of Cedars-Sinai property, services or personnel, as well as gifts or entertainment.

- Our financial relationships with physicians and other referral sources never will be based on the value or volume of actual or potential referrals, and will always be within the legal standards of "commercially reasonable" and "fair market value," and will be appropriately structured to comply with applicable law and Cedars-Sinai policies.
- Patients who need a referral should be given the names of providers, facilities or suppliers who can meet the individual's particular needs and situation. Referrals will be based on the individual's clinical needs and personal preferences and the provider's, facility's or supplier's ability to meet the individual's needs.

Contracting, Procurement and Purchasing

We make purchasing decisions based on objective, selective criteria such as price, quality, technical expertise, timely delivery, services standards and adequate supply. If you are involved in such a decision, act with integrity in negotiating and awarding contracts in all purchasing and service transactions. Make decisions based on objective criteria and not on personal relationships, friendships or personal financial benefit.



YOU HAVE A RESPONSIBILITY TO REPORT, EVEN IF IT'S NOT YOUR ACTION

Each of us has a responsibility to ensure our own actions are within the Standards of Conduct, and to notify our supervisor if we observe or have knowledge of someone else at Cedars-Sinai who may be violating the Standards of Conduct. You have the same reporting obligations regardless of who the alleged violator is—**colleague, supervisor, senior executive, medical staff, board member, volunteer, vendor or subcontractor.** Cedars-Sinai policy prohibits any retaliation against a person for reporting in good faith a possible Standards of Conduct violation.

HOW TO REPORT

You can ask a question or report your concern or a suspected violation of the Standards of Conduct or Cedars-Sinai policy, by contacting your supervisor.

If for any reason you are not comfortable reporting your concern or a suspected violation to your supervisor, you should contact the vice president of your division. If you are not comfortable doing that, you may report your concern or a suspected violation to the Corporate Integrity office.

You may also make an anonymous inquiry or report by calling the Cedars-Sinai Corporate Integrity Hotline (1-800-CEDARS-5).

All of these people are responsible for ensuring that your concern/report/question is addressed. In all cases, Cedars-Sinai policy protects you from retaliation for reporting in good faith a concern or a possible Standards of Conduct violation.



OUR COMMITMENT TO YOU

Fair and Thorough Investigative Process

We will act promptly to investigate possible Standards of Conduct violations but will not jump to premature conclusions, as it is crucial that every investigation is fair and thorough. To ensure safety and security for our patients and staff, in some cases we may take interim steps (such as placing an employee on administrative leave) before an investigation is completed. These interim steps are based on an abundance of caution, and do not necessarily mean that we have completed our investigation or have found there has been a violation of the Standards of Conduct, Cedars-Sinai policies or a law/regulation.

No Retaliation

Cedars-Sinai policy prohibits any retaliation against a person who makes a good faith report of a possible Standards of Conduct violation or helps with an investigation.

Anonymous Reporting

Because Cedars-Sinai prohibits retaliation against a person for reporting a possible Standards of Conduct violation, most people identify themselves when making a report. However, if you do not wish to disclose your identity when submitting a concern or report of a possible violation, Cedars-Sinai will protect your anonymity to the extent practicable and permitted by law. However, please keep in mind that in some cases anonymity may prevent us from determining if the concern should be investigated and may also prevent a thorough investigation.

Reporting to Regulatory Agencies and Law Enforcement

If in the course of conducting our investigation we find information indicating that a crime may have been committed, we will report the information to the appropriate law enforcement agency. In some cases, we may recommend that the victim contact the appropriate law enforcement agency. At that point, the decision about pursuing a criminal investigation is made by the appropriate law enforcement agency. Similarly, we will report findings to regulatory agencies if indicated.

If we find information indicating that a licensed professional (such as a physician, nurse, pharmacist, etc.) may have committed a violation of their licensure, we will report the information to the appropriate licensing body for their review.

Separately, Cedars-Sinai may continue its own investigation on whether a Cedars-Sinai policy or these Standards of Conduct have been violated and may take action regarding the employee based on its own investigation.





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