



Code of Conduct



**Integrity and
Compliance**
TOGETHER

Mayo Clinic Values

Primary Value

The needs of the patient come first.

Respect

Compassion

Integrity

Healing

Teamwork

Excellence

Innovation

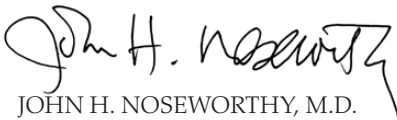
Stewardship

The three shields of the Mayo logo symbolize patient care, medical education and research. They also represent our organizational identity and the standards and traditions that have contributed to the success of Mayo Clinic for 150 years. Much of what sustains the quality and strength of the three shields is our conduct and behavior as individuals.

As the health care environment continues to change, the need to preserve Mayo's tradition of honest and ethical behavior is more important than ever. The Code of Conduct is an essential component of the Integrity and Compliance Program.

The practice of behaving honestly, ethically and with integrity is an individual responsibility. Every day, we make choices about how to conduct ourselves; we are each accountable for our decisions. The Code of Conduct is provided to you as a resource. Please refer to it when you have questions about any part of the Integrity and Compliance Program or the Integrity and Compliance Office.

Thank you for your role in strengthening and sustaining Mayo's standards and for all you do to serve our patients.

A handwritten signature in black ink that reads "John H. Noseworthy". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

JOHN H. NOSEWORTHY, M.D.
PRESIDENT AND CHIEF EXECUTIVE OFFICER
MAYO CLINIC

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An Overview

Integrity and Compliance Program

Mayo Clinic created the Integrity and Compliance Program to reinforce Mayo's commitment to conducting its business with integrity. When we behave with integrity, we adhere to the highest standards of professionalism, ethics and personal responsibility. By doing so, we aim to be worthy of the trust our patients place in us.

The Mayo Clinic Code of Conduct ("this Code") is a formal statement of Mayo's standards and rules of ethical business conduct. Through this Code, we communicate our ethical standards to Mayo's trustees, officers, employees, all Mayo subsidiaries, those we do business with, and the general public. This Code is an essential part of the Integrity and Compliance Program.

The Integrity and Compliance Office

The Integrity and Compliance Office oversees the Integrity and Compliance Program. Compliance officers are available as a resource for questions and concerns about the health care regulatory environment. They work with department and division chairs, physician leaders and appropriate committees to ensure compliance with complex regulations. The Office also provides annual education on compliance topics for all employees.

The Integrity and Compliance Office receives reports of suspected violations of Mayo policy, laws or regulations. Every report, whether received directly or through the Compliance Hotline, is thoroughly investigated.

Why does Mayo need an Integrity and Compliance Program?

Mayo needs this Program for the following reasons:

- To provide a formal statement of Mayo's standards of ethical business conduct to all employees and business partners
- To provide information about laws, regulations and Mayo policies
- To protect Mayo and its staff from legal action if a breach of ethical conduct occurs
- To meet the expectations of government regulatory agencies

Mayo is committed to a culture that prevents, detects and corrects conduct that does not conform to laws, regulations, Mayo policy or this Code.

Does the Mayo Clinic Integrity and Compliance Program apply to me?

The Integrity and Compliance Program leads in setting the ethical tone for work conducted at Mayo. No person's job or position at Mayo is more important than preserving Mayo's reputation for integrity.

The Integrity and Compliance Program applies to each of us. This includes:

- Mayo trustees and officers
- Employees at all Mayo sites (physicians, scientists, voting staff, allied health staff)
- Contract employees
- Short-term research appointees
- Students
- Volunteers
- People who do business with Mayo

All are expected to follow the standards described in this Code.

- Compliance is everyone's responsibility.
- Each of us who works at Mayo has a responsibility to report, in good faith, any known or suspected violation of Mayo policy, law or regulation.
- Anyone who, in good faith, reports suspected wrongdoing will be protected from retaliation.
- All Mayo employees must complete annual Integrity and Compliance Program training.

What if I need more information about the Code of Conduct?

This Code cannot anticipate every circumstance you may face. If you have questions or see or know about a possible violation of this Code or a law or regulation, talk to your supervisor, administrator, department or division chair, appropriate physician leader or call the Integrity and Compliance Office.

You can report concerns anonymously and confidentially through:

- The Compliance Hotline at:
1-888-721-5391 (toll-free)
- The Internet at:
MayoClinicComplianceReport.com

This Code covers nine areas of conduct. For more information about each of these areas, go to the Integrity and Compliance Office intranet site (search word: *compliance*).

Ethics

Mayo's policy is to prevent unethical or unlawful behavior, to halt such behavior as soon as possible after its discovery, and to discipline employees who violate the standards in this Code. You must comply with this Code, seek clarification through the Integrity and Compliance Office when questions or issues arise, and assist in any investigation of wrongdoing.

This Code cannot cover all circumstances or anticipate every situation. If you encounter a situation not addressed specifically by this Code, you should apply the overall philosophy and concepts of this Code to the situation. You also should be mindful of the values for which Mayo stands (search words: *Mayo Clinic values*). Mayo Clinic's policy is to obey the law. Even when the law is permissive or silent, Mayo will make choices based on our values of honesty and integrity.

You, our business partners, and the public must understand that Mayo cares how results are obtained, not just that they are obtained. You are encouraged to openly discuss issues with each other and with your managers, to record transactions accurately in books and records (including medical records), and to be honest and forthcoming with internal or external auditors. Mayo expects honesty in all aspects of your work — whether in patient care, education or research.

Conflict of Interest and Outside Activities

You must avoid situations in which your personal interests could conflict, or *reasonably appear to conflict*, with the interests of Mayo. For example, any opportunity for personal financial gain apart from your normal compensation is a potential conflict of interest.

Personal Financial Gain

You should avoid any outside financial interest that might influence your decisions or actions as a Mayo employee, such as:

A personal or family interest in an enterprise that has a business relationship with Mayo.

- This restriction does not apply to minimal holdings of a publicly traded corporation that may incidentally do business with Mayo.

An investment in another business that competes directly with Mayo.

- This does not apply if the investment is not a significant part of your or your family's net worth, or the area of competition is minimal.

Outside Activities

You should avoid outside employment or activities that could:

- Have a negative impact on your job performance or Mayo's reputation in the community, or
- Conflict with your obligation to Mayo

If you think you may have a conflict of interest due to investments or outside activities, you should consult the Conflict of Interest Review Board intranet site (search words: *conflict of interest*).

Use of Mayo Funds and Assets

Mayo assets are to be used solely for the benefit of Mayo. You may not use Mayo assets for your personal gain. Assets are more than equipment, inventory, funds, and office supplies. Assets include medical records, concepts, financial data, intellectual property rights, research data, business strategies, and plans about Mayo activities.

Government Investigations

You must cooperate with government employees conducting investigations. Government investigators have the right to contact you at work or at home for work-related issues. The Legal Department should be contacted immediately about any unexpected government interview or investigation. In most situations, you have the right to decide when and where the interview will be conducted. For more information about your rights regarding government investigations, contact the Integrity and Compliance Office.

Anti-Corruption Laws

It is illegal in the United States to offer a bribe to any U.S. or foreign government official in order to get or keep business or influence the official's actions. Bribes include cash, gifts, services, entertainment or anything of value. If a government official involved in a Mayo transaction asks you for anything of value for their personal benefit, you should immediately contact the Integrity and Compliance Office or the Legal Department.

Other Improper Payments

The use of Mayo funds or assets for any unlawful or unethical purpose is prohibited. Making payment to a third party for any purpose other than that shown in Mayo's records is prohibited.

Confidential Information and Trade Secrets

Mayo patient records must remain confidential as required by Mayo policies, applicable laws and regulations, and our patients' expectations.

In addition, you must safeguard Mayo's confidential and proprietary business information and trade secrets. This includes information not generally disclosed to the public or information that is useful to Mayo's competitors. This could include, in some cases:

- Financial data
- Planned new projects
- Information about Mayo's expansion plans
- Employee information
- Capital investment plans
- Projected earnings
- Changes in Mayo's management or policies
- Unpublished research data

Discuss proprietary information with others only on a need-to-know basis. Disclose proprietary information to persons outside of Mayo *only* in consultation with the Legal Department, which can provide appropriate disclosure agreements. Do not inadvertently discuss confidential information or trade secrets in either social conversations or in routine business relations.

Privacy

- Mayo Clinic has a longstanding commitment to guarding the confidentiality of Protected Health Information (PHI). PHI is health information of a deeply private and personal nature. Maintaining the confidentiality of PHI is the responsibility of every person at Mayo.
- PHI is intended to be used only in the course of treatment, research, education or other institutional purposes by individuals within Mayo as they perform their assigned duties. Note: you should only use the minimum amount of PHI necessary to meet the intended purpose.
- Intentional violations of this policy will not be tolerated and may be grounds for disciplinary action. Disciplinary action may include termination of your employment. In addition to loss of employment, you could be subject to criminal or professional penalties.
- Mayo Clinic retains all rights to all Mayo Clinic patient PHI acquired during the course of the patient's care at Mayo.
- The following principles apply if you wish to electronically review your own record, or the record of a family member or friend:
 - You may access your own record. You are encouraged to discuss your questions or concerns with your care provider.
 - If you provide care for a family member or friend, you must appropriately document the medical record as their care provider.
 - If you are not providing care for a family

member or friend, you may access their records only if a written and signed authorization is in the record.

- You may only electronically access your minor child's record if you are the treating provider and document appropriately.
- Even if you have appropriate authorization to access PHI online, you should only obtain paper copies of PHI through the appropriate and usual resources available to all patients (search word: *privacy*).

Information Security

As we become more reliant on technology, the confidentiality of patient information and Mayo's business information is crucial. Security starts with you. It is your responsibility to protect Mayo's information.

- Do not open a link or email attachment from an unknown or unexpected source.
- Encrypt all confidential information before transmitting it outside Mayo.
- Create a strong password and never reveal it to others. Mayo will never ask for your ID or password through email.
- Do not insert a flash drive or any other peripheral device into any Mayo computer if the drive was given to you by an unknown source.
- Contact the Help Desk for support.

Social Media

Social media refers to online communities and personal blogs in which users post information, personal messages, and other content. When you use social media:

- Maintain patient privacy and do not share confidential information about Mayo.
- If you identify your connection to Mayo, make it clear you are speaking for yourself and not for Mayo.
- Your social media activities should meet Mayo's high standards of professional conduct.
- Be professional, use good judgment, and be accurate and honest in what you say. Unprofessional language or behavior will reflect poorly on Mayo.
- Be respectful toward patients, colleagues, business partners and Mayo's competitors.
- Social media activity must not interfere with your work commitments.
- Contact Mayo's Center for Social Media with questions.

Suppliers and Referring Providers

Dealing with product and service suppliers, as well as referring providers, can present ethical and legal problems. The following guidelines are intended to help you make ethical decisions in these potentially difficult situations.

Kickbacks and Rebates

You or your family must not receive personal kickbacks or rebates as a result of Mayo's purchase or sale of goods or services. Kickbacks or rebates can take many forms and are not limited to direct cash payments or credits. In general, if you or your family member stands to gain personally from a transaction, that transaction is prohibited. Such practices are unethical and often illegal.

Reciprocity

Mayo often purchases goods or services from suppliers who also buy goods or services from Mayo. This practice is normal and acceptable, but any form of pressure for reciprocity with suppliers is not. You must never ask suppliers to buy Mayo products or services in order to become a Mayo supplier.

Gifts or Gratuities from Businesses

Personal gifts of any kind are not acceptable under any circumstances. Suppliers, other companies, or individuals conducting business with Mayo, or wishing to conduct business with Mayo, may not give you gifts of cash, food, entertainment, tickets, travel, or other benefits.

Food from Businesses

It is against Mayo policy for any industry representative to bring or deliver food to any Mayo site. However, monetary grants from businesses to offset the cost of modest refreshments for bona fide educational meetings may be solicited and accepted, with Mayo providing the refreshments. You can find more information in the food and gift matrixes available on the Integrity and Compliance intranet site (search words: *food and gifts*).

Medical-Industry Relations Policies also are available on the intranet (search words: *medical industry relations*).

Gifts from Patients

Patients who desire to make a gift to Mayo should be referred to the Development Office.

- Gifts of substantial value that cannot be refused graciously should be delivered to Development.
- All gifts of money must be forwarded to Development.

Some patients may insist on making a personal gift to you that cannot be declined without embarrassing the patient. If the gift is small, you may accept and share it with your coworkers (e.g., flowers or a box of candy). You may keep and use small gifts that cannot be shared (e.g., a necktie).

This topic can be difficult. Seek guidance from your supervisor, administrator, department or division chair, appropriate physician leader, the Integrity and Compliance Office, or Development.

Business Meals

When business meetings include a meal, modest offers of hospitality may be made and accepted by outside business representatives or by Mayo employees.

Entertainment by Businesses

It is unethical to ask any person or company conducting business with Mayo for entertainment of any kind (e.g., theater tickets, golf outings, sports events). In particular, you should avoid any offer that is intended to gain favor for business suppliers. You should decline invitations from vendors, pharmaceutical representatives or business representatives for any entertainment not included in the agenda of a professional educational event, such as national meetings, continuing medical education, and preapproved advisory board meetings.

Payment to Agents, Representatives, Outside Consultants

Agreements with agents, sales representatives or outside consultants must be reasonable in terms of the value of the service provided and the amount of the payment in comparison to trade practices. Any agreement involving more than \$10,000, or lasting longer than one year, must be in writing.

Books and Records

Falsification of Records

Federal law requires that Mayo's books and records accurately reflect the true nature of the transactions represented. You must not create or be a part of the creation of any records intended to mislead or to hide anything that is improper.

- It is against Mayo policy, and likely illegal, to knowingly cause Mayo's books and records to be inaccurate.
- Falsifying records can include making records appear as though payments were made to one person when payments actually were made to another, submitting expense accounts which do not accurately reflect the true expense, or creating any records that do not accurately reflect what occurred.
- Permanent entries in Mayo records must never be altered.
- Payment may not be made if any amount will be used for a purpose other than that described in the documents supporting the transaction.
- Slush funds or similar off-book accounts, in which there is no accounting for receipts or expenditures on corporate books, are strictly prohibited.

False Claims Act

Mayo devotes many resources to prevent and correct billing errors involving Medicare, Medicaid and its other payers. The federal government and many states have False Claims Act laws to penalize billing fraud, waste and abuse. If you suspect billing errors are occurring, you have an obligation to

report these to management or the Integrity and Compliance Office. Employees who report in good faith will be protected from retaliation. The Integrity and Compliance Office can provide more information and resources on billing issues.

Retention of Records

Disposing of Mayo's records and files is not discretionary. Applicable laws require that certain records be kept for specific periods of time, particularly records related to:

- Employees
- Health, safety and the environment
- Taxes and finances
- Contracts
- Corporate areas
- Research

Relevant records must not be destroyed if any litigation, government investigation or audit is pending. Until the related matter is closed, destroying records to avoid disclosure in a legal proceeding may be a criminal offense. For more information, refer to the Record Retention and Management page on the Integrity and Compliance Office intranet site (search word: *compliance*).

Political Activity and Contributions

Mayo is a tax-exempt entity. As a condition of that tax-exempt status, tax regulations prohibit Mayo from conducting political activities. This prohibition applies to all Mayo entities, as well as to your activities as a Mayo employee during work hours. Any use of Mayo resources to distribute statements supporting or opposing any political candidate or position or to engage in political fundraising is prohibited.

Mayo encourages you to participate in the political process outside the workplace. Your personal political activity, however, should not reference Mayo or your position at Mayo.

It is against Mayo policy, and may be illegal, for you to:

- Enter, directly or indirectly, any political contribution on your expense account that causes Mayo to reimburse you for that expense. This includes the cost of fundraising tickets for political functions and fundraising dinners. Even if Mayo business is discussed at such events, it is against Mayo policy and possibly illegal to include such costs on your expense account.
- Use any Mayo property, facilities, employee time, or the Mayo intranet for any political activity. Examples of prohibited actions include: using Mayo secretarial time to send invitations for political fundraising events, using a Mayo telephone to make political solicitations, allowing any candidate to use any Mayo meeting rooms for political campaigning, or using Mayo property in a political campaign.

- Use Mayo's email to communicate personal political opinions to other individuals, elected representatives, government agencies, newspapers, periodicals, or other external organizations. Since the email address includes the Mayo name and is visible to those receiving the email, your political opinions might be construed as official Mayo policy.

Mayo and other tax-exempt organizations are permitted to engage in very limited lobbying activities. Such activities are coordinated through Public Affairs, the Legal Department and Mayo leadership. Because the political process is highly regulated, you should consult the Integrity and Compliance Office before agreeing to do anything that could be construed as involving Mayo in any political activity in the U.S. or in any foreign country.

Safety, Health and Environment

Mayo is committed to providing a safe and healthy workplace for you and visitors to our premises. Mayo is equally committed to wisely managing and sustaining natural resources and minimizing the impact of our operations on the land, air and water. These commitments are met only through your cooperation.

Each of us has a responsibility to:

- Abide by safe operating procedures
- Guard our own and our fellow employees' health and safety
- Use pollution control systems

Government agencies review and enforce compliance with safety, health, and environmental laws. It is Mayo's policy to comply with these laws and to cooperate with inspection and enforcement personnel. You are encouraged to report any conditions that you believe to be unsafe, unhealthy or hazardous to the environment.

Employee Relations

You should treat everyone in Mayo's diverse community with respect, including patients and their families and your colleagues (search words: *Mayo Clinic values*). Equal opportunity in employment and education at Mayo Clinic is a moral and legal obligation. Mayo selects, employs, admits, educates, advances, promotes, transfers and compensates each person on the basis of their individual capability, potential or contribution to the programs and goals of the institution. Mayo also is committed to upholding laws prohibiting discrimination on the basis of race, color, creed, religion, gender, age, national origin, marital status, sexual orientation, veteran's status, disability, or status with regard to public assistance.

If you see or know about a possible violation of Mayo policy or applicable law or regulation, share your suspicion with your supervisor, administrator, division or department chair, appropriate physician leader or the Integrity and Compliance Office.

Compliance Resources

You are expected to comply with this Code and its underlying policies and procedures. You are encouraged to talk to each other if you have questions or concerns. When in doubt, it is your responsibility to seek clarification from your supervisor, administrator, division or department chair, appropriate physician leader, the Integrity and Compliance Office, the Legal Department, the Office of Medical-Industry Relations or the Conflict of Interest Review Board.

You can find additional guidance through these resources:

- Medical-Industry Relations Policies
- Conflict of Interest Policy
- Other Mayo Clinic policies

The Integrity and Compliance Office is responsible for implementing the Integrity and Compliance Program. The Office provides training and information about this Code, Mayo policies, and related laws and regulations to Mayo's employees, business partners, vendors and those who work on behalf of Mayo.

**How to report
suspected violations
or seek compliance
information**

The Integrity and Compliance Office operates a confidential 24-hour Compliance Hotline for questions and reports about compliance-related issues and this Code. Trained professionals at an external company with Compliance Hotline expertise receive the reports, which are forwarded to Mayo for action. If you choose, you can use the Compliance Hotline without giving your name. Interpreter services are available. If you make a report, you will be given a password so that you can anonymously check on the status of your report. Reach the Hotline:

- By phone at 1-888-721-5391 (toll-free), or
- On the Internet at MayoClinicComplianceReport.com

If you report suspected violations in good faith, you will be protected from any form of retaliation.

Disciplinary action

If you knowingly violate this Code of Conduct, you will be subject to appropriate corrective action, up to and including termination of employment. If you think you have been unfairly disciplined, you may follow the appeal process described in your employee policy manual.

Frequently Asked Questions

Why do we need an Integrity and Compliance Program?

Fraud, waste and abuse in health care can result in criminal prosecution, civil liability and fines. The Integrity and Compliance Program demonstrates Mayo's commitment to ethical behavior and provides a means to discover and correct mistakes early. Mayo does not treat your honest mistakes as fraud.

Why am I required to complete training on the Integrity and Compliance Program?

Compliance education is an important tool to help you be aware of and understand your responsibilities and accountability. The Integrity and Compliance Program defines proper and ethical conduct for doing business. The current health care environment is complex, and the Integrity and Compliance Program can help you understand and comply with legal and ethical standards that will protect both you and Mayo.

Who works in the Integrity and Compliance Office?

Each Mayo Clinic campus or region has an Integrity and Compliance Office staffed by a compliance officer.

What happens if there is a suspected violation of this Code of Conduct?

The assigned compliance officer will investigate the suspected violation. Additional staff may assist with the investigation, such as physicians, administrators, Human Resources, or the Conflict of Interest Review Board.

Does the U.S. or state government require compliance programs?

Yes. To participate in government programs like Medicare and Medicaid, applicable laws require Mayo to have an effective compliance program to prevent fraud, waste and abuse.

We do business with a company that wants to fly several of us to its headquarters for a meeting. Is this allowed?

No. This free travel must be refused because such arrangements may constitute a conflict of interest. This Code requires you to avoid conflicts of interest or even the appearance of a conflict of interest. If there are legitimate reasons to make such a trip, Mayo should pay the travel costs.

As a staff member, I receive my medical care here. Is my medical record kept confidential?

Yes. Mayo policy and this Code require all employees to respect the confidentiality of every patient and his or her protected health information. Confidentiality standards are the same for all patients, including patients who are also employees.

I'm concerned about the health of a coworker and want to do what I can to help. Is it acceptable to look up my coworker's medical record?

No. You may only access patient information as required for you to complete your work. Accessing patient information for any other reason may be grounds for disciplinary action, up to and including termination of your employment.

For More Information or to Report a Suspected Violation

You are expected to comply with this Code of Conduct and the Integrity and Compliance Program. To report a suspected violation of this Code, of an applicable law or regulation, or simply to ask questions, use the resources below.

- Visit the Integrity and Compliance intranet site (search word: *compliance*).
- Talk to your supervisor, administrator, division or department chair, or appropriate physician leader.
- Contact the compliance officer at your campus or region.
- Call the Compliance Hotline at 1-888-721-5391 (toll-free).
Interpreter services are available.
Calls are anonymous and confidential.
- Use the Internet at MayoClinicComplianceReport.com.
Online reports are anonymous and confidential.
- Call the Mayo Clinic Chief Compliance Officer at 507-284-9029.
- Call the Legal Department at 507-284-2650.

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