

The Joint Commission *Code of Conduct*



The Joint Commission



Joint Commission Center
for Transforming Healthcare®



Joint Commission
Resources





Code of Conduct

TABLE OF CONTENTS

Letter from the President.....	4
Purpose, Vision and Mission Statements.....	6
Enterprise Corporate Values.....	7
Introduction and Definitions	8
Principle 1: Legal Compliance.....	9
Principle 2: Business Ethics	11
Principle 3: Confidentiality	13
Principle 4: Conflicts and Dualities of Interest	16
Principle 5: Core Activity and Relationships	18
Principle 6: Protection of Assets	20
Principle 7: Workplace Conduct and Employment Practices.....	22
Administration and Application	24
Getting Help and Reporting	24

A message from the President...



To Joint Commission Enterprise Personnel:

Welcome to the refreshed Code of Conduct. This Code of Conduct has been updated to remain current and to provide us an opportunity to renew our commitment to the mission, values and ethical principles we hold dear. It is important to remember that the ability of The Joint Commission to achieve its mission requires that we continually strive to maintain the remarkable reputation for integrity that this organization has earned throughout its long history. This means that all of us are called upon to:

- Conduct all our activities in a way that is truly compliant with our professional, legal, and ethical responsibilities.
- Observe the principles and adopt the behaviors of a safety culture.


Every year, we will continue to ask all staff to review and agree to follow the Code of Conduct. The code recognizes that in conducting our business we have a responsibility to The Joint Commission, our peers, partners and the health care community that we serve. Because we are an accrediting body with many stakeholders, including the government and the public, our every action is closely scrutinized by many interested parties. I think you will agree that one of our most valuable assets is our reputation.

The new Code of Conduct is better able to guide responsible decision-making with tools to promote organization-wide integrity and to demonstrate that complying with our legal and ethical obligations is a natural extension of what we do every day. The Code of Conduct is our map toward these goals; it orients and directs us in our day-to-day work and in our dealings with others. Our work is not easy; but it is also both professionally and personally rewarding. I thank you for the pride you take in your work and I encourage you to be mindful of the Code of Conduct and of your role in keeping the Joint Commission's reputation one that others strive to emulate.

Sincerely,

A handwritten signature in black ink that reads "Mark R. Chassin". The signature is fluid and cursive, with a clear "R" and "C".

Mark R. Chassin, MD, FACP, MPP, MPH
President and Chief Executive Officer
The Joint Commission



“The code of conduct sets forth the basic principles we hold dear in conducting our business and it recognizes our responsibilities to our peers, partners and the health care community that we serve”

-Dr. Chassin

Always strive to do the right thing. If you're unsure what the right thing is, use this code of conduct as your guide to responsible decision making.



PURPOSE

This Code of Conduct has been adopted by the Board of Commissioners of The Joint Commission, the Board of the Joint Commission Center for Transforming Healthcare and the Board of Directors of Joint Commission Resources to provide standards to guide Joint Commission Personnel (as defined on page 8) in conducting themselves to protect and promote organization-wide integrity and to enhance The Joint Commission's ability to achieve its declared mission.

VISION STATEMENT

All people always experience the safest, highest quality, best-value health care across all settings.

MISSION STATEMENTS



The Joint Commission

To continuously improve health care for the public, in collaboration with other stakeholders, by evaluating health care organizations and inspiring them to excel in providing safe and effective care of the highest quality and value.



Joint Commission Center for Transforming Healthcare

To transform healthcare into a high reliability industry by developing highly effective, durable solutions to health care's most critical safety and quality problems in collaboration with health care organizations by disseminating the solutions widely and by facilitating their adoption.



Joint Commission Resources

To continuously improve the safety and quality of health care in the United States and in the international community through the provision of education, publications, consultation, and evaluation services.

Enterprise Corporate Values

QUALITY

We believe that our customers are entitled to quality services and products provided in the most cost-effective manner

TEAMWORK

We believe that a productive work environment requires teamwork, active collaboration, and clear and open communication within and across organizational units

RESPECT

We value the contributions of each individual, encourage development of individual capabilities, emphasize the importance of individual well-being, and gain strength from the diversity of our staff

COURTESY

We affirm that courtesy is essential in all relationships

INTEGRITY

We pledge that honesty and ethical behavior will characterize all of our transactions

EMPOWERMENT

We believe that each employee should have the authority and support necessary to contribute effectively to continuous improvement in organization performance

RESPONSIVENESS

We seek to understand and be responsive to the needs of one another and the needs of those who use our products and services

RECOGNITION

We believe that effective performance should be recognized

IMPROVEMENT

We seek to continually improve our performance

GETTING STARTED

INTRODUCTION

This Code of Conduct contains *principles* which articulate the broad policy goals of The Joint Commission and *standards* which set forth specific measures to guide the behavior of all Personnel. The principles set forth in this Code of Conduct shall be distributed periodically to all Joint Commission Personnel. All Joint Commission Personnel shall ensure that their behaviors and activities are consistent with this Code of Conduct, and as applicable, with the Joint Commission's policies and procedures and the Joint Commission Employee Handbook.



DEFINITIONS

as defined in the Code of Conduct

THE JOINT COMMISSION

Refers to the corporate enterprise and each of its divisions and operating units including, but not limited to, The Joint Commission's wholly controlled not-for-profit affiliate, Joint Commission Resources Inc. (JCR), JCR's international division, Joint Commission International (JCI), the Joint Commission Surveyor and QHR Consultant Corporation and the Joint Commission Center for Transforming Healthcare (the Center) and any wholly owned foreign subsidiaries and affiliates as they may be formed.

JOINT COMMISSION PERSONNEL

Includes the terms "officer," "commissioner or director," "employee," designated "contractors," student "interns", "fellows" and "agents" and certain collaborators, alliance or strategic partners

JOINT COMMISSION EMPLOYEE

Refers to officers and employees but not "commissioner or director, independent contractors or agents"

BUSINESS

Includes all operations of The Joint Commission

ACCREDITATION

When the term Accreditation is used, the term incorporates accreditation, certification, designation and any other evaluation-type activities of The Joint Commission

PRINCIPLE 1. LEGAL COMPLIANCE

The Joint Commission shall strive to ensure that all activities by or on behalf of the organization are in compliance with applicable laws and regulations.

The following standards provide guidance to all Joint Commission Personnel to support their compliance with applicable laws. These standards are neither exclusive nor complete. Joint Commission Personnel are required to comply with all applicable laws, whether or not specifically addressed in these policies.

Standard 1.1. Antitrust

All Joint Commission Personnel shall comply with applicable antitrust and similar laws that promote competition. Examples of conduct prohibited by the antitrust laws include agreements to fix prices, rig bids, or other collusion with competitors intended to reduce competition for purchases of goods or services; boycotts; certain kinds of exclusive dealing; in certain circumstances, the tying of the sale of one product or service to a requirement to purchase another product or service; and unfair trade practices that may include bribery, misappropriation of trade secrets, deception, intimidation, or similar unfair business activity.

Standard 1.2. Tax Exemption

As a tax-exempt, not-for-profit entity, The Joint Commission has a legal and ethical obligation to act in compliance with applicable tax laws, to engage in activities in furtherance of its charitable purpose, and to ensure that its resources are used in a manner which furthers the public good rather than the private or personal interests of any individual or groups of individuals. Consequently, The Joint Commission and all Joint Commission Personnel shall avoid compensation

arrangements in excess of fair market value, shall provide accurate reports to appropriate taxing authorities, shall file all tax and information returns in a manner consistent with applicable laws and shall avoid the appearance of impropriety as well as actual impropriety. (See Principle 4: Conflicts and Dualities of Interest.)

Political Activity/ Lobbying

Joint Commission Personnel shall not engage in lobbying on behalf of The Joint Commission unless authorized. Political campaign activity on behalf of The Joint Commission is prohibited because it jeopardizes the tax-exempt status of the organization.

- **Political Activity** – No individual shall contribute or make any agreement to contribute any money, property, or services of any Joint Commission Personnel at The Joint Commission's expense to any political candidate, party, organization, or committee. Joint Commission Personnel may contribute money, time, or service to political organizations or campaigns, but they must do so as individuals, and not as a representative of The Joint Commission.

- **Lobbying** – The Joint Commission may participate in designated lobbying activities:
- The Joint Commission may engage in advocacy when consistent with its mission, and may analyze and take positions on issues that have a relationship to the operations or interests of The Joint Commission and/or the quality and safety of care;
- The Joint Commission may offer recommendations through written or oral testimony and statements concerning legislation, regulations or policy decisions being considered by governmental agencies; and
- The Joint Commission can comment on existing federal or state law and administrative procedures.

Q&A

Jennifer is campaigning for a local candidate and would like to bring in a support statement for her colleagues to sign. Is this okay?

As a tax exempt organization, The Joint Commission cannot support political candidates. Your activity in this area must be separate from The Joint Commission and only be done on personal time.

The Joint Commission lobbying activities are coordinated through Department of State & External Relations or The Joint Commission's Washington, DC office.

The Joint Commission has many contacts and dealings with governmental bodies and officials. All such contacts and transactions shall be conducted in an honest and ethical manner. An example of prohibited behavior would be any attempt to influence the decision-making process of governmental representatives or officials through bribery or other offer deemed improper. Any requests or demands by any governmental representative for any improper benefit shall immediately be reported.



I. Legal Compliance

- Use of another's copyrighted work normally requires permissions. Contact Legal to discuss.

Standard 1.3 International Business Practices

The policy of The Joint Commission is to abide by all laws applicable to the jurisdictions in which it operates, and it expects all contracted third parties, and their agents & subcontractors, with which it does business to also comply with those laws. All Joint Commission Personnel, joint-venture partners, or anyone else doing business with The Joint Commission is required to comply strictly with the International Business Practices Policy, the Foreign Corrupt Practices act, and all applicable laws.

Standard 1.4. Protecting the Environment

The Joint Commission shall manage and operate its businesses in a manner that respects its environment and conserves natural resources. All Joint Commission Personnel shall strive to utilize resources appropriately and efficiently, to recycle where possible and otherwise dispose of all waste in accordance with applicable laws and regulations, and work cooperatively with the appropriate authorities to remedy any environmental contamination for which The Joint Commission may be responsible.

Standard 1.5 Intellectual Property

The Joint Commission complies with the laws and regulations that govern the rights to and protection of our own and other's copyrights, trademarks, patents, trade secrets, and other forms of intellectual property.

PRINCIPLE 2. BUSINESS ETHICS

In furtherance of The Joint Commission's commitment to the highest standards of business ethics and integrity, all Joint Commission Personnel shall accurately and honestly represent The Joint Commission and shall not engage in any activity or scheme intended to defraud anyone of money, property or honest services.

The standards set forth below provide guidance to ensure that The Joint Commission's business activities reflect the high standards of business ethics and remain consistent with the corporate value of integrity. Leadership will inspire others to be accountable to deliver results with integrity, and all staff will use teamwork and the sharing of information to foster ethical decision-making. Joint Commission Personnel's conduct not specifically addressed by these standards shall be consistent with Principle 2.

Standard 2.1. Ethics of Information

(a) Honest Communication

The Joint Commission requires candor and honesty from all Joint Commission Personnel in the performance of their responsibilities and in any Joint Commission related communication with each other, the government, customers and The Joint Commission attorneys and auditors. No Joint Commission Personnel shall knowingly make false or misleading statements of any kind, including through the use of email, about The Joint Commission, its products and services, or competing accreditation entities and their products and services. All staff applying for research grants or performing research of any type are responsible for maintaining high ethical standards in any written or oral communications regarding their research projects as well as for following appropriate research guidelines and Joint Commission policies.

(b) Use of Other's Proprietary Information

Joint Commission Personnel will obtain appropriate authorizations prior to use of any confidential or proprietary information, publication, computer program or software, or product belonging to any other person or entity. All Joint Commission Personnel shall ensure that they do not improperly copy for their own use or for The Joint Commission's use any documents or computer programs in violation of applicable copyright, or trademark laws or licensing agreements.

II. Business Ethics

- You must treat all customers, fellow employees and contracted third parties with respect, honesty, fairness and integrity.
- Never compromise integrity for a quick solution.



Standard 2.2. Ethics of Accounting Information

The principle of business ethics incorporates The Joint Commission values of integrity and respect as a core elements of our corporate culture. This often involves doing what's right for the business, without regard to personal outcomes or ulterior motives.

(a) Internal Control

The Joint Commission has established control standards and procedures to ensure that assets are protected and used and that financial records and reports are accurate and reliable. All Joint Commission Personnel share the responsibility for maintaining and complying with required internal controls.

(b) Financial Reporting

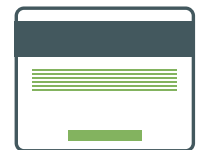
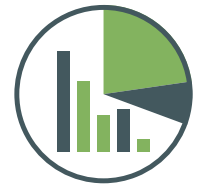
All financial reports, accounting records, research reports, expense accounts, time sheets and other documents shall accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation, or financial reporting is contrary to the policy of The Joint Commission and may be in violation of applicable laws.



Standard 2.3. Fraud

Honest behavior is expected from all Joint Commission Personnel. Fraud is prohibited. Fraud includes, but is not limited to:

- A dishonest or fraudulent act;
- Embezzlement;
- Forgery or alteration of negotiable instruments such as Joint Commission checks or drafts;
- Misappropriation of Joint Commission assets;
- Unauthorized handling or reporting of Joint Commission transactions; and
- Falsification of records or financial statements for personal or other reasons.
- Unauthorized use of corporate card for personal purchases.



Q&A

Sue heard Joe saying he's going to pad his expense report to make it more worth his while. What should Sue do?

Call the Compliance Officer at 630-792-5627 or call the Compliance Hotline at 1-800-750-4972

Any Joint Commission Personnel who suspect that any fraudulent activity may have occurred or are aware of any activity in violation of this Code of Conduct are required to report such concerns to an Officer, the General Counsel, or the Corporate Compliance Officer.

PRINCIPLE 3. CONFIDENTIALITY

In accordance with applicable legal and ethical standards, Joint Commission Personnel shall maintain the confidentiality of The Joint Commission's intellectual property, employee and financial information, and any confidential proprietary or otherwise sensitive information received from or about health care organizations including protected health information.

The Joint Commission and Joint Commission Personnel are in possession of and have access to a wide variety of confidential, sensitive, and proprietary information, the inappropriate release of which may be unlawful or could be injurious to staff or health care organization customers and clients. All Joint Commission Personnel shall actively protect and safeguard confidential, sensitive, proprietary information, as defined herein and in Joint Commission policies in a manner designed to prevent the unauthorized disclosure of such information. The prohibition for Joint Commission Personnel on releasing confidential, sensitive or proprietary information does not terminate with the cessation of their relationships with The Joint Commission.

Standard 3.1. Organization-Specific Information

The Joint Commission commits to health care organizations that certain documents received through the Accreditation processes will be kept confidential. Likewise, JCR and the Center commit to its client and participating organizations that any information about the organization obtained in connection with the performance of services will be treated as confidential and will not be disclosed without the organization's written authorization or as required by legal process. All Joint Commission Personnel are responsible for maintaining the confidentiality of any organization-specific information in accordance with applicable laws and Joint Commission policies. Joint Commission Personnel also have an obligation to maintain the confidentiality of any outside organization's proprietary information when such is acquired in the course of providing services to that organization. When Joint Commission Personnel obtain knowledge of a health care organization's intellectual property or confidential proprietary information in the course of the provision of services, such knowledge shall be treated with the same degree of confidentiality that is given to such Joint Commission information.

III. Confidentiality

You must comply with all company policies relating to the use of encryption. For example, to protect confidential information all company laptops are encrypted, and when transmitting files containing personally identifiable information via email, the file should be encrypted.



Standard 3.2. Protected Health Information

All Joint Commission Personnel shall conduct themselves in accordance with Joint Commission policy and all applicable laws and regulations to comply with the principle of maintaining the confidentiality of protected health information. This includes any patient data to which The Joint Commission is given access as an employer or in the course of providing business associate services to health care organizations. Joint Commission Personnel shall comply strictly with applicable HIPAA law and regulations regarding the confidentiality of protected health information, and complete any required HIPAA Privacy and Security training.

Standard 3.3. Personnel Actions/Decisions

Salary, benefit, and other personal information relating to Joint Commission employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters, and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Joint Commission Personnel shall exercise due care to prevent the release or sharing of information beyond those persons who may need such information to fulfill their job functions.

Standard 3.4. Certain Financial Information

The Joint Commission believes in transparency of certain financial information. Therefore, IRS Form 990 is available to the public upon request and is posted on The Joint Commission's web site, and the Accreditation fee schedule is posted on the accredited organization's extranet site and is available to potential customers. However, the following specified financial information shall be treated as confidential and limited to those persons with a business need-to-know: insurance claim information; business rules; internal audit reports; survey contract information; customer financial information; vendor bids; certain business contract information such as negotiated discounts; tax analyses and assessments; government approved contract rates, including calculations and methodology; corporate credit card information; credit card information submitted with expense reports for employees or guest travelers; and JCR consulting and JCI Accreditation pricing information. Joint Commission Personnel shall exercise due care to prevent the release or sharing of such information beyond those persons who may need such information to fulfill their job functions.

Standard 3.5. Information Security

The Joint Commission is committed to providing appropriate information security safeguards. Joint Commission Personnel are provided access to The Joint Commission's IT network when authorized for business purposes. Joint Commission Personnel are responsible for ensuring that their behavior will maintain administrative, physical and technical safeguards. This includes but is not limited to protecting their passwords, protecting their computing and storage devices (laptops, tablets, USB devices, etc.), maintaining the security of sensitive data, not accessing information to which they are not authorized, not installing unauthorized material on their PCs, and reporting any vulnerabilities or breaches of security to the IT Service Desk immediately, and following the instructions of the IT Service Desk when remediating a security risk.



Q&A

Julie's sister is the CNO at a hospital that is in their window for survey and she asks Julie if she can give her a hint, not the exact date but a hint on when the survey team will arrive on-site. Julie wants to know how to respond to her sister and if she needs to report this?

The date of any unannounced survey is considered confidential information and should not be shared outside the select few individuals within the accreditation team which get that information. To share with her sister would be a breach. Reporting should be done if there is any breach of confidential information to the compliance officer.



Standard 3.6. Firewall Policies

It is of the utmost importance to The Joint Commission to maintain the integrity and independence of The Joint Commission's Accreditation process and the integrity of JCR consultative activities. To prevent improper sharing of information, The Joint Commission has created the Firewall Policy which is designed to ensure that no confidential organization-specific information is shared between The Joint Commission's Accreditation functions and the consultative functions of JCR. Joint Commission Personnel are responsible for ensuring that their actions are consistent with the Firewall Policy, procedures, protocols, and guidelines that have been established. All violations to the policy must be reported. Personnel are encouraged to raise concerns or to ask questions to clarify their understanding of the operations of the firewall.

Standard 3.7 Data Privacy

International, federal & state laws regulate the access, use, maintenance, transfer & destruction of individual personally identifiable information, maintained by The Joint Commission. Examples of personally identifiable data includes but is not limited to: social security numbers, or names with demographic information, credit card information, account numbers, date of birth, or drivers license numbers. To protect personally identifiable information, all Joint Commission Personnel shall:

- Be aware of any personal information with which they work;
- Understand the legal and contractual limitations on the use of personal information;
- Collect, use and disclose personnel information consistent with the law and Joint Commission policies;
- Properly store or transport personal information
- Report any unauthorized access, use or disclosure.

Standard 3.8 Teleworker Security

While teleworking or working remotely, individuals must maintain a high level of security vigilance to ensure the physical and technical security of their electronic information.

Employees should:

- Lock your screen when you are away from your device
- Physically lock or secure your device when it is not in your immediate possession
- Power down your device when it is not in use
- Keep confidential data in encrypted space.

Avoid:

- Leaving your device or materials unattended in an unsecured location
- Allowing Non-Joint Commission personnel to use your device.
- Using a public or unsecured internet connection, but if necessary, only access Joint Commission systems through the Joint Commission VPN (Junos Pulse)

Q&A

Mike is traveling to Dubai for Joint Commission International and he would like to work on his budget on his laptop and possibly make a work-related phone call while on the plane.

Is this a problem?

You must be careful not to discuss or display Joint Commission confidential information in public places, such as in planes, taxis, trains, elevators or at conferences and trade shows. When it is necessary to conduct a telephone call in a public place, be mindful of your surroundings. Privacy screens should be used on computers to prevent others from seeing your work. Reconsider any use of free public WiFi in airports as it is at high risk of hacking.

PRINCIPLE 4. CONFLICTS AND DUALITIES OF INTEREST

Joint Commission employees and Board members owe a duty of undivided and unqualified loyalty to the organization. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization. Additional provisions regarding conflicts that apply to Joint Commission employees and Personnel are set forth in the applicable conflicts policies.

Joint Commission Personnel shall regulate their activities to avoid actual impropriety and/or the appearance of impropriety that might arise from their activities or involvement with other persons or entities that, if not disclosed, have the potential to adversely impact The Joint Commission. Joint Commission Personnel shall not make public statements with regard to Joint Commission matters unless authorized to make such statements as a representative of The Joint Commission. Should a conflict or duality be identified, it must be disclosed. All Personnel are encouraged to refer to the relevant Conflict of Interest Policy for more detail.

Definition:

Conflict of Interest – A conflict of interest occurs when an interested person has a financial interest individually or as it relates to a family member, which is disclosed as or found to (a) impair the individual’s objectivity or (b) create an unfair competitive advantage for any person or organization other than The Joint Commission. Conflict of interest means more than individual bias. There must be a financial interest that could directly affect the work or services of Personnel to be considered a conflict.

Duality of Interest – A duality of interest occurs when an interested person has a significant personal interest or corporate interest which is disclosed as or found under the policy to be a competing fiduciary obligation which could affect the professional objectivity or commitment to service to The Joint Commission. A duality of interest may also occur when an interested person is an uncompensated director or officer position with an entity which competes with The Joint Commission for grants, contributions, or contracts.

Standard 4.1. Outside Financial Interests

While not all-inclusive, the following is a general description of the types of activities by any Joint Commission Personnel, or household member of such person, which would create a conflict or duality of interest:

- **Competition for Opportunities.** Competition with The Joint Commission by any Joint Commission employees or Board members, directly or indirectly, through the purchase, sale, or ownership of property or property rights or interests or business investment opportunities.
- **Ownership or Employment Interests.** Ownership in, employment by, or engagement in another business relationship with any outside concern which does business with The Joint Commission. This does not apply to stock or other investments held in a publicly held corporation, provided that the value of the stock or other investments does not exceed 5% of the corporation’s stock. The Joint Commission may, following a review of the relevant facts, permit ownership interests which exceed these amounts if management concludes such ownership interests will not adversely impact The Joint Commission’s business interests or the judgment of the affected person.
- **Accreditation-Related Consulting.** All Joint Commission employees are prohibited from providing accreditation-related consulting services. The Joint Commission defines accreditation-related consulting quite broadly and review of the conflict of interest policy is recommended for more detail.

Q&A

Joan has been asked to review the medication reconciliation process of a former employer. Can she do that?

Since this an area covered by Joint Commission standards and national patient safety goals, helping an organization in any non-employed capacity with medication reconciliation would be considered “accreditation-related” consulting and therefore prohibited activity under the conflict of interest policy.

- **Conduct of Outside Business.** Conduct of any business not on behalf of The Joint Commission with any Joint Commission vendor, supplier, contractor, or agency, or any of their officers or employees.
- Interested Transactions – Representation of The Joint Commission by any Joint Commission Personnel in any transaction in which he or she or a household member has a substantial personal interest.
- Non-Financial Interests – Involvement in the management or oversight of a business or charity, whether or not competitive to The Joint Commission, which may divide the loyalty of Joint Commission Personnel to The Joint Commission.

Q&A

John needs to make some extra money and wants to get a part-time job as an Uber driver. Is this a problem?

As long as the extra job does not create a conflict under the conflict of interest (COI) policy, and the organization with which he works is disclosed on his COI annual statement, this would be acceptable.

Standard 4.3. Participation on Boards of Directors/ Trustees

- Each Joint Commission employee must obtain approval from the responsible supervising officer prior to agreeing to serve as a member of the Board of Directors/Trustees of any Accredited organization or an organization whose interests may conflict with those of The Joint Commission.
- Any Joint Commission employee who is asked or seeks to serve on the Board of Directors/Trustees of any organization whose interests do not impact The Joint Commission (e.g., civic, charitable, fraternal organizations) shall not be required to obtain such supervisory approval.
- All fees and/or compensation (other than reimbursement for expenses arising from Board participation) that are received for Board services provided during normal work hours shall be paid directly to The Joint Commission.
- The Joint Commission retains the right to prohibit membership on any Board of Directors/Trustees where such membership might conflict with the best interests of The Joint Commission.



Standard 4.2. Services for Competitors/Vendors

Joint Commission employees shall not perform work or render services for any competitor of The Joint Commission or for any organization with which The Joint Commission does business or which seeks to do business with The Joint Commission outside of the normal course of his or her employment with The Joint Commission unless such work or service has been identified as an allowable exception in the Conflict of Interest Policy and approval has been provided by the person's supervisor.

Standard 4.4. Honoraria

Any honoraria provided to a Joint Commission employee for a speaking engagement or educational program that relates to the activities of The Joint Commission and/or the individual's position with The Joint Commission (see The Joint Commission Conflict of Interest Policy for rules on such participation for Joint Commission employees) shall be turned over to The Joint Commission.

PRINCIPLE 5. CORE ACTIVITY AND RELATIONSHIPS

Joint Commission transactions with organizations seeking to obtain or retain Joint Commission business vendors, contractors, and other third parties shall be conducted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

The standards set forth below are intended to guide key Joint Commission Personnel in determining the appropriateness of certain activities or behaviors in the context of The Joint Commission's core activities and relationships. This policy shall be construed broadly to avoid even the appearance of improper activity.

V. Core Activity and Relationships

Gifts given internationally must be given consistent with the International Business Practices Policy. The JCR Office of the CEO has identified what gifts are appropriate in the international setting.

Standard 5.1. Gifts and Gratuities

The Joint Commission needs to preserve and protect its reputation at all times and to avoid even the appearance of impropriety. When making purchases, decisions, or acting on behalf of The Joint Commission, gifts, favors, services, or other things of value should not be accepted by Joint Commission Personnel unless otherwise authorized. Similarly, the offer or giving of money, services, or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official, or other person by The Joint Commission is absolutely prohibited. Please refer

to the Gift, Meals, and Entertainment Standards Policy for information related to the accreditation process decision-making and gifts, gifts from existing vendors, and vendor sponsored meals.

Q&A

Xerox has offered me tickets to see the Chicago Cubs in the World Series.

Can I accept them?

Unfortunately, our gift policy prohibits accepting entertainment of any kind from a vendor of The Joint Commission.

Standard 5.2. Contracting

Joint Commission Personnel may not utilize "insider" information from any business activity conducted by or on behalf of The Joint Commission for their own benefit. All business relations with contractors must be conducted at arm's length both in fact and in appearance and in compliance with Joint Commission policies and procedures. Joint Commission Personnel must disclose personal relationships and business activities with contractor personnel that could be construed by an impartial observer as improper with reference to the Joint Commission Personnel's performance or duties.

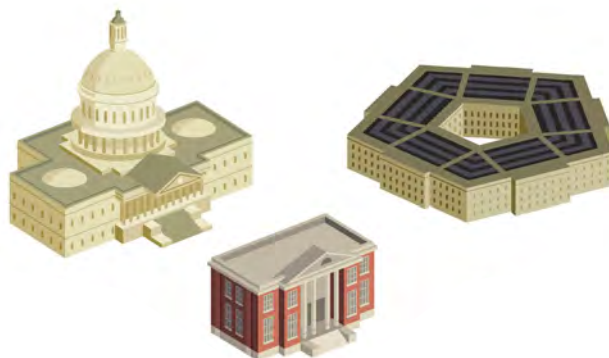
Joint Commission Personnel have a responsibility to obtain clarification from management on questionable practices that may arise. Non-governmental grant support or sponsorship must be approved by the Corporate Sponsorship Committee and formalized in an approved written agreement.

Standard 5.3. Business Inducements

Joint Commission Personnel shall not seek to gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting or receiving any form of bribe or other improper payment is prohibited. Appropriate commissions, rebates, discounts, and allowances are customary and acceptable business inducements provided that they are approved by Joint Commission management, or the CFO or his or her designee, and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to whom the original agreement or invoice was made or issued. Such payments are not to be made to individual employees or agents of business entities. In addition, Joint Commission Personnel may provide gifts, entertainment, and meals of nominal value to Joint Commission customers, current and prospective business partners, and other persons when such activities have a legitimate business purpose, are reasonable, and are consistent with all applicable laws.

Standard 5.4. Relationships with Government Agencies

Joint Commission Personnel relationships with government agencies, officials, and employees must be conducted with honesty and integrity and must be in compliance with the letter and intent of applicable laws and regulations. In any procurement situation, offering or giving gifts is strictly forbidden. It is Joint Commission policy to cooperate with all reasonable requests concerning company operations from federal, state, municipal, and foreign governmental agencies, such as the Government Accountability Office, the Department of Health and Human Services, the Office of Inspector General and various state agencies. However, when non-routine requests from government agencies are received, employees should consult with senior management, the Department of State & External Relations (for state agency requests), The Joint Commission's Washington, DC office (for federal agency requests), or the Legal Department prior to responding to such requests.



Q&A

Mary gets asked out to dinner by a vendor who has submitted a proposal in response to a Request for Proposal (RFP). She wants to know if she can go?

If Mary is part of the decision process to select the vendor then no gift or acceptance of dinner is appropriate.

PRINCIPLE 6. PROTECTION OF ASSETS

All Joint Commission Personnel shall strive to preserve and protect The Joint Commission's assets by making prudent and effective use of Joint Commission resources and properly and accurately reporting its financial condition.

The standards set forth below are intended to guide Joint Commission Personnel by articulating The Joint Commission's expectations with respect to activities or behaviors which may impact The Joint Commission's financial health or which reflect reasonable and appropriate use of the assets of a not-for-profit entity.

Standard 6.1. Internal Control

The Joint Commission has established control standards and procedures to ensure that its assets are protected and properly used and that financial records and reports are accurate and reliable. All Joint Commission Personnel share responsibility for maintaining and complying with required internal controls.

Standard 6.2. Travel and Entertainment

Travel and entertainment expenses should be consistent with each Joint Commission employee's job responsibility and the organization's needs and resources. It is Joint Commission policy that Joint Commission employees should not suffer financial loss or experience financial gain as a result of business travel and entertainment. Joint Commission employees shall exercise reasonable judgment in the use of Joint Commission assets and spend the organization's assets as carefully as they would spend their own. Joint Commission Personnel also shall comply with Joint Commission policies relating to travel and entertainment expenses.

Standard 6.3. Use of Corporate Assets

All Joint Commission Personnel are expected to refrain from converting assets of The Joint Commission to personal use. All property and business of The Joint Commission shall be conducted in a manner designed to further The Joint Commission's interests rather than the personal interest of any individual.

a. Joint Commission Equipment

Joint Commission Personnel who have been entrusted with the care of The Joint Commission portable devices must safeguard such devices, including tablets, smartphones, and laptops from loss, theft or unauthorized use. Use of Joint Commission devices must comply with all Joint Commission policies. Permission must be obtained before installing any software on Joint Commission owned devices. Prior to engaging in any activity on company time which will result in remuneration to Joint Commission Personnel or the use of The Joint Commission's equipment, supplies, materials, or services for personal or non-work related purposes, Joint Commission Personnel shall obtain the approval of an appropriate manager.

VI. Protection of Assets

- Corporate credit cards are to be used only for approved business purposes.
- Always protect Joint Commission property.
- Intellectual property can be many things such as marketing strategies, business plans and other items.

If you are not certain, contact the Legal Department

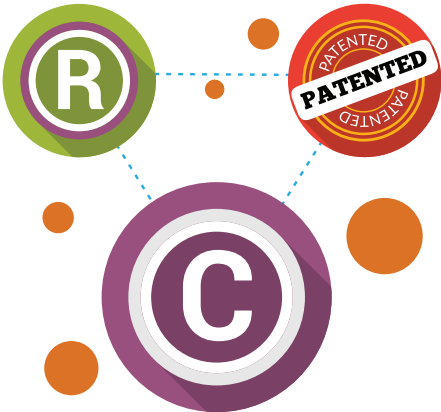
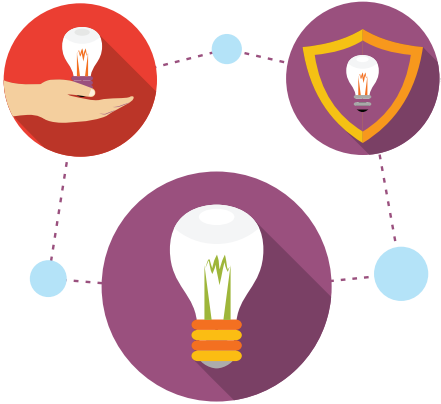
Q&A

I am bored sitting at the airport, can I load a game onto my company laptop?

Games are not approved to be loaded on company laptops.

b. Joint Commission Data

Joint Commission Personnel are prohibited from using or manipulating data gathered for or provided by The Joint Commission in a manner which is inconsistent with Joint Commission written policies or for non Joint Commission purposes. Data provided to The Joint Commission may be confidential and it is also considered an asset.



Standard 6.4 Proprietary Information

Ideas and intellectual property assets of The Joint Commission are important to organizational success. Confidential information pertaining to The Joint Commission's competitive position, strategies to accomplish its mission, or information relating to negotiations between The Joint Commission and third parties shall be protected and shared only with Joint Commission Personnel having a need to know such information in order to perform their job responsibilities. Joint Commission Personnel shall exercise care to ensure that The Joint Commission's intellectual property rights, including patents, trademarks, copyrights and software are carefully maintained and managed to preserve and protect their value.

Q&A

My spouse needs to use my company laptop to complete work he did not get done in the office this week, is that ok?

Access to Joint Commission equipment is for authorized personnel. Consider that by providing access, you either have to share your encryption key (not allowed) or sign him in, which gains him access to anything on your laptop. If confidential information is contained on your laptop, then that would be considered a breach of confidentiality.

Q&A

Can I give information regarding a Joint Commission or JCR customer to my uncle who does healthcare consulting?

Joint Commission and JCR data can only be used for Joint Commission business unless specifically authorized.



Standard 7.2. Ethics of the Workplace

a. Safety Culture

The Joint Commission supports and functions within a Safety Culture - that is, a work environment that fosters mutual trust and individual accountability by embracing a respectful exchange of ideas and other behaviors that lead to organizational learning; continuous improvement; and processes, services, and products that are consistently excellent. Corporate behaviors reflect the three imperatives of trust, report, and improve.

b. Professional Conduct

The Joint Commission expects each Joint Commission employee to use common sense and good judgment and holds all Joint Commission employees to the highest standards of conduct, etiquette, and professionalism in all of their employment-related dealings with customers, vendors, and co-workers. It is against Joint Commission Safety Culture for employees to exhibit unprofessional conduct of any kind, including but not limited to disruptive, discourteous, intimidating, disrespectful or abusive behavior, threats or physical assaults, to other Joint Commission Personnel or the personnel of any entity having a relationship with The Joint Commission. The Joint Commission reserves the right to impose appropriate disciplinary or contractual action for any behavior it considers to be disruptive and/or inappropriate. Consistent with the expectation of using common sense and good judgment, The Joint Commission expects work attire to communicate a professional attitude. All staff should be familiar with and abide by the Dress Policy that is designed to promote a professional attitude and image.

Standard 7.3. Safety

The Joint Commission is committed to providing a safe work environment for all Joint Commission Personnel. As an employer, The Joint Commission adheres to applicable laws, regulations, rules, and guidelines to ensure an environment free from recognized hazards that might cause harm to Joint Commission employees. Personnel are responsible for carrying out their duties in a safe and efficient manner when working at or on behalf of Joint Commission. Safety consciousness must be a key part of all Personnel thinking and planning. All Personnel must report any unsafe conditions immediately, including any suspicious, or unauthorized person found on the premises. Threats, acts of violence, abuse, or intimidation are not tolerated. The possession of firearms or any weapons is prohibited on company property. The use of illegal substances or abuse of legal substances is inconsistent with the professional and responsible behavior expected of all Joint Commission employees.



Q&A

Annie Oakley is going to the shooting range with some friends after work. She has a valid concealed carry permit. Can she leave her firearm locked in her car during the day while she's at work?

The possession of firearms, or any weapons, is prohibited on company property, while at work, or representing The Joint Commission.

ADMINISTRATION AND APPLICATION

The Joint Commission expects each person to whom this Code of Conduct applies to abide by the principles and standards set forth herein and to conduct the Accreditation activities, business, and affairs of The Joint Commission in a manner consistent with the general statement of principles set forth herein and in all Joint Commission Policies and Procedures and in The Joint Commission Employee Handbook.

Contractor/Partner Responsibilities:

- Understand and comply with the Code of Conduct.
- Prevent compliance violations and protect the reputation of the company.
- Report if you believe or suspect a violation has occurred.

Employee Responsibilities:

- Ensure personnel providing services or interacting with The Joint Commission read, understand, and comply with this code.

Leadership Responsibilities:

1. Officers and Managers will assume a leadership role in the promotion of ethical conduct and ensuring all employees are familiar with the Code of Conduct.
2. Create an open environment to support staff in asking questions and making ethical decisions.

Failure to abide by this Code of Conduct, the guidelines for behavior that the Code of Conduct stipulates, or the other policies referenced herein may lead to disciplinary action. For alleged violations, The Joint Commission shall weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the Code of Conduct or other relevant policies, the egregiousness of the behavior, the Joint Commission Personnel's history with the organization, and other factors which The Joint Commission deems relevant. Discipline may, at The Joint Commission's discretion, range from verbal counseling to termination of employment or relationship. In the event that any Joint Commission Personnel are covered by the terms of a collective bargaining agreement, discipline shall be in accordance with the provisions of that agreement.

Note: Nothing in this Code of Conduct or in other policies referred to herein is intended to or shall be construed as providing any additional employment or

contract rights to Joint Commission Personnel or other persons. While it generally attempts to communicate policy changes concurrent with or prior to the implementation of such changes, The Joint Commission reserves the right to modify, amend or alter this Code of Conduct and its related policies at any time it deems necessary.

GETTING HELP

When a question arises over the ethics of a particular scenario, all Joint Commission Personnel are encouraged to make decisions consistent with the Code and with maintaining the integrity of The Joint Commission. The Joint Commission's reputation rests on the strength of each individual's business conduct. Should any questions about this Code of Conduct arise, the Corporate Compliance and Privacy Officer should be contacted at (630) 792-5627.



REPORTING OF POTENTIAL VIOLATIONS

All Personnel are expected to report potential violations of this Code of Conduct as follows:

- To your supervisor, who will report up as necessary;
- If it is an HR related issue to call HR at #5621;
- If the matter is related to a security breach, to the Security Officer thru the IT HELP Desk;
- All other compliance related matters to the Corporate Compliance and Privacy Officer at 5627;
- If anonymity is desired to the HOTLINE at 1-800-750-4972.

The Joint Commission has a non-retaliation policy which prohibits any punishment from good faith reporting of a concern about compliance with policy or legal requirements.

If any requirements in this Code of Conduct directly conflicts with applicable law, the applicable law shall govern.

HIERARCHY OF JOINT COMMISSION ETHICAL PRINCIPLES

The Joint Commission Mission, Vision and Values, Code of Conduct, Employee Manual and Policies and Procedures Definitions and Relationships with each other.

MISSION/VISION/VALUES

High level statements of purpose of the organization, a definition of the way we look to the future and the shared beliefs which define our culture.

Example: Value of Integrity

THE JOINT COMMISSION CODE OF CONDUCT

A set of principles and standards to guide individual Joint Commission Personnel behavior to achieve our mission. The values are incorporated into the Code of Conduct.

Example: Principle 2, Standard 2.4 Fraud

POLICIES AND PROCEDURES


Administrative and more detailed statements related to specific corporate or department operations which require day to day operational guidance and controls.

Example: Fraud Control Policy

EMPLOYEE HANDBOOK

Summarizes key HR policies with pertain to employees.

Example: Handbook Section – Working for The Joint Commission – Progressive Discipline and Performance Improvement



Thank you for
your commitment
to operate ethically,
lead with honesty and
integrity and for your
continued dedication to
uphold the standards and
principles set forth
in our code of conduct.



The Joint Commission



Joint Commission Center
for Transforming Healthcare®



Joint Commission
Resources