The Joint Commission

The Joint Commission
Code of Conduct

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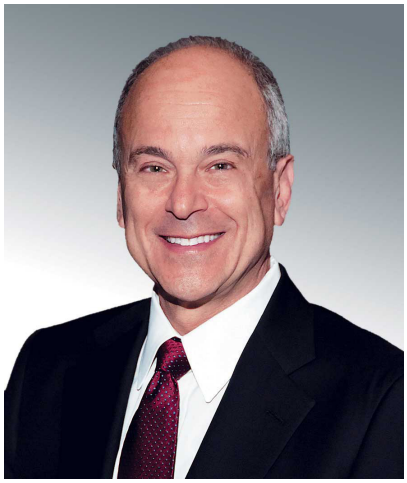


A message from the President…

To Joint Commission Enterprise Personnel:

Life can be challenging, and it can test one's character. Recently, the pandemic and resulting economic disruption showcased companies and individuals failing the test and displaying bad behavior, taking advantage of the situation to further scams, offering fraudulent treatments, and engaging in greedy behavior by hoarding personal protective equipment (PPE) or accepting exceedingly large loans from the Small Business Administration. On the other hand, there were prominent examples of stellar behavior which are the ones we will remember and talk about. The individual heroes who fought daily battles on the front lines and the leaders who took accountability, working hard to get the job done in a safe manner so the organization could retain a reputation of integrity and resiliency. I am proud to say The Joint Commission is one such organization, one that cares, and one that maintains a reputation of integrity and continually leads by example for the future.

There are many reasons why we maintain our remarkable reputation. These include remaining true to our mission, practicing our values and the ethical responsibilities outlined in our Code of Conduct. We are releasing a refreshed Code of Conduct this year to make sure it is up to date, provides clarity, and is written in a user-friendly language.

This means that each of us is 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.

The Code of Conduct is sent to each employee annually to renew the commitment to the mission, values and ethical principles and to practice it within The Joint Commission, and with our peers, partners and the health care community that we serve. I think you will agree that one of our most valuable assets is our reputation, and I thank you for doing your part.

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,

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 7) in conducting themselves in a manner which protects and promotes organization-wide integrity and enhances 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 health care 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

Ethical situations vary across the organization and it might not always be clear which path to take. This Code of Conduct contains *principles* which articulate The Joint Commission's broad policy goals and *standards*, to help Joint Commission Personnel make good choices to enhance our integrity. This Code of Conduct guides our commitment to a Safety Culture that promotes openness, trust and respect to support the organization's visions, mission, and value statements. The Code of Conduct is distributed periodically to all Joint Commission Personnel, and their behaviors and activities must be consistent with this Code of Conduct, and as applicable, with the Joint Commission's policies and procedures, and the Joint Commission Employee Handbook.

As part of our performance management system, we set expectations in two areas: business objectives and behavioral expectations. The behavioral expectations are aligned with our corporate values, RPI, and Safety Culture. They are designed to drive outstanding performance. Both the Code and Enterprise Behaviors are aligned through our Enterprise Corporate Values.

DEFINITIONS

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 affiliates, Joint Commission Resources, Inc. (JCR), JCR's international division, Joint Commission International (JCI), 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, alliances, 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.

Joint Commission Personnel are required to comply with all applicable laws and regulations, regardless of whether specifically addressed in this Code of Conduct. The following standards, although not exclusive or complete, provides guidance to all Joint Commission Personnel to support their compliance with applicable laws and regulations.

STANDARD 1.1. ANTITRUST

Joint Commission Personnel must comply with all 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 is obligated to act in compliance with applicable tax laws, to engage in activities that further its charitable purpose, and to ensure that its resources are used in a manner to further the public good rather than the private or personal interests of any individual or groups of individuals. Accordingly, The Joint Commission and all Joint Commission Personnel must: (1) avoid compensation arrangements in excess of fair market value, (2) provide accurate reports to appropriate taxing authorities, (3) file all tax and information returns in a manner consistent with applicable laws and (4) avoid any impropriety including any appearance of impropriety. (See Principle 4: Conflicts and Dualities of Interest.)

POLITICAL ACTIVITY/ LOBBYING

Unless authorized, Joint Commission Personnel must not engage in lobbying on behalf of The Joint Commission. All political campaign activity on behalf of The Joint Commission is prohibited because it jeopardizes the tax-exempt status of our organization.

Political Activity – Joint Commission Personnel must not contribute or agree to contribute any money, property, or services to any political candidate, party, organization, or committee as a representative of The Joint Commission. Any contribution of money, time, or service to political organizations or campaigns must be done as an individual and not as a representative of The Joint Commission.

Lobbying – The Joint Commission may participate in designated lobbying activities including:

- Advocacy when consistent with our mission, and to analyze and take positions on issues that impact The Joint Commission's operations, its interests and/or the quality and safety of care;
- Providing recommendations through written or oral testimony and statements concerning legislation, regulations, or policy decisions being considered by governmental agencies; and
- Commenting on existing federal or state law and administrative procedures.

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

STANDARD 1.3 INTERNATIONAL BUSINESS PRACTICES

The Joint Commission's policy is to comply with all laws applicable to the jurisdictions in which it operates. Accordingly, The Joint Commission expects all Joint Commission Personnel and its contracted third parties, including all agents and subcontractors, to comply with those laws. Further, all Joint Commission Personnel, joint-venture partners, or anyone else doing business with The Joint Commission is required to comply with The Joint Commission's International Ethical Business Practices Policy and all applicable laws.

I. Legal Compliance – Use of another's copyrighted work normally requires permissions. Contact Legal to discuss.

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.

STANDARD 1.4. PROTECTING THE ENVIRONMENT

The Joint Commission manages and operates its businesses in a manner that respects its environment and conserves natural resources. All Joint Commission Personnel should utilize resources appropriately and efficiently, recycle where possible, dispose of waste in accordance with applicable laws and regulations, and work collaboratively 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 is committed to comply 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. Joint Commission Personnel must not use other organization's logos or trademarks without appropriate authorizations.

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 below provide guidance so 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 Joint Commission Employees will foster ethical decision-making through teamwork and by sharing information. Joint Commission Personnel's conduct must be consistent with Principle 2, whether or not specifically addressed by these standards.

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 2.1. ETHICS OF INFORMATION

(a) **Honest Communication**

The Joint Commission requires candor and honesty from all Joint Commission Personnel while performing their responsibilities and when communicating with each other, the government, customers, and The Joint Commission attorneys and auditors. Joint Commission Personnel must not knowingly make false or misleading statements of any kind, including through email or social media, about The Joint Commission, its products and services, or competing accreditation entities and their products and services. All Joint Commission Employees applying for research grants or performing research 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 must 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 must not improperly copy for their own use or for The Joint Commission's use any documents, presentations, or software in violation of applicable copyright, trademark laws, or licensing agreements.

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 so that assets are protected and used responsibly, and that financial records and reports are accurate and reliable. All Joint Commission Personnel are responsible 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 must accurately and clearly represent the relevant facts of the transaction's true nature. Improper or fraudulent accounting, documentation, or financial reporting is against Joint Commission policy and may be in violation of applicable laws.

STANDARD 2.3. FRAUD

Q&A

Sue heard Joe say 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 the Compliance Hotline at 1-844-489-1052.

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

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

Any Joint Commission Personnel who suspect that fraudulent activity may have occurred or are aware of any Code of Conduct violation must report their 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 may have access to a wide variety of confidential, sensitive, and proprietary information, the inappropriate release of which may be unlawful or could be harmful to staff or health care organization customers and clients. All Joint Commission Personnel must actively protect and safeguard confidential, sensitive, and proprietary information, as defined below and in Joint Commission policies, to prevent the unauthorized disclosure of such information. Unless authorized, Joint Commission Personnel are prohibited from releasing confidential, sensitive, or proprietary information even after their relationships with The Joint Commission terminates.

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 their clients and participating organizations that confidential organizational information obtained in connection with the performance of services will be treated as confidential and will not be disclosed without the organization's written authorization unless covered under existing agreements 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, contractual obligations, and Joint Commission policies. Joint Commission Personnel also have an obligation to maintain the confidentiality of any outside organization's proprietary information acquired while providing services to that organization. When Joint Commission Personnel obtain knowledge of a health care organization's intellectual property or confidential proprietary information, it must be treated with the same degree of confidentiality that is given to Joint Commission's confidential 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 must maintain the confidentiality of protected health information. This includes any access to patient data given to The Joint Commission as an employer or in the course of providing business associate services to health care organizations. Joint Commission Personnel must comply with applicable HIPAA laws 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 personnel information relating to Joint Commission Employees must be treated as confidential. Personnel files, payroll information, disciplinary matters, and similar information must be securely maintained to ensure confidentiality in accordance with applicable laws. Joint Commission Personnel must exercise a high degree of care to prevent the release or sharing of personnel information. In addition, personnel information must only be released or shared with those 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 posted on The Joint Commission's website. Additionally, the Accreditation fee schedule is posted on the accredited organization's extranet site and is available to potential customers. However, the following financial information must 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.

Q&A

Julie prefers to work from her personal laptop and sends her work materials to her personal email so she can access them from her personal laptop. ***If she deletes the emails right away is this ok?***

It is never permissible to forward confidential work information to a personal email address. Julie should use the Office365 web portal to access her files and work on them securely in the cloud. Julie should contact the IT Service Desk for assistance if she does not know how to access the web portal.

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 they adhere to all administrative, physical, and technical safeguards, including but not limited to:

(1) protecting their passwords;
(2) protecting their computing and storage devices (laptops, tablets, USB devices, cloud storage, etc.);
(3) maintaining the security of sensitive data;
(4) only accessing information to which they are authorized;
(5) only installing authorized material on their PCs;
(6) reporting any security vulnerabilities or breaches immediately to the IT Service Desk; and
(7) following IT Service Desk instructions when remediating a security risk.

STANDARD 3.6. FIREWALL POLICIES

The Joint Commission is committed to maintaining the integrity and independence of its accreditation process and the integrity of JCR consultative activities. To prevent improper sharing of information, The Joint Commission's Firewall Policy is designed to ensure that no confidential organization-specific information is shared between The Joint Commission's Accreditation activities and JCR's consultative activities. Joint Commission Personnel are responsible for complying with the established Firewall Policy, procedures, protocols, and guidelines. All violations of the policy must be reported to the Compliance Department. Personnel are encouraged to raise concerns or to ask questions to clarify their understanding of the Firewall Policy.

STANDARD 3.7 DATA PRIVACY

International, federal and state laws regulate the access, use, maintenance, transfer, and destruction of personally identifiable information maintained by The Joint Commission. Examples of personally identifiable information includes, but is not limited to: social security numbers, names with demographic information, credit card information, account numbers, dates of birth, or driver's license numbers. To protect personally identifiable information, all Joint Commission Personnel must:

- Be aware of any personal information to which they have access;
- Understand the legal and contractual limitations on the use of personal information;
- Collect, use, maintain, share, and disclose personnel information consistent with applicable laws and Joint Commission policies;
- Respond appropriately to data subject requests and concerns;
- Securely store or transport personal information; and
- Report any unauthorized access, use, or disclosure.

STANDARD 3.8 TELEWORKER SECURITY

While teleworking or working remotely, individuals must ensure the physical and technical security of their electronic information. Employees should:

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

Avoid:

- Leaving their device or materials unattended in an unsecured location;
- Allowing non-Joint Commission Personnel to use their device; and
- Using a public or unsecured internet connection, but if necessary, only access Joint Commission systems through the Joint Commission VPN.

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 Wi-Fi 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 must avoid actual impropriety and/or the appearance of impropriety (improper, inappropriate, or unethical behavior) 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 must not make public statements with regard to Joint Commission matters unless authorized. All potential or actual conflicts or duality of interest 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 or potential conflict of interest occurs when a Joint Commission Employee, contractor or Board Member have a financial interest individually or as it relates to a family member, which is or may (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 Joint Commission Personnel to be considered a conflict.

Duality of Interest - A duality of interest occurs when a Joint Commission Employee, contractor or Board member has a significant personal interest or a competing fiduciary obligation which could affect the professional objectivity or commitment to service, or compete with that individual's duty to The Joint Commission.

STANDARD 4.1. OUTSIDE FINANCIAL INTERESTS

While not all-inclusive, the following are types of activities by Joint Commission Personnel, or a family member, which would create a conflict or duality of interest:

- **Accreditation-Related Consulting.** Providing accreditation-related consulting services outside the work performed for The Joint Commission.
- **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.
- **Conduct of Outside Business.**
  - Using the Joint Commission name or information to achieve a personal advantage when conducting any personal business with any Joint Commission vendor, supplier, contractor, or agency, or any of their officers or employees.
  - Any Joint Commission Personnel, or a family member, representing The Joint Commission in a transaction in which they have a substantial financial interest.
  - 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.

STANDARD 4.2. SERVICES FOR COMPETITORS/VENDORS

Unless approved by Senior Leadership, Joint Commission Employees must not perform work or provide services outside of the normal course of their employment with the Joint Commission for:

- any competitor of The Joint Commission; or
- any organization with which The Joint Commission does business; or
- any organization which seeks to do business with The Joint Commission.

Q&A

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

Since this is 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.

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 Policy, and the organization with which he works is disclosed on his Conflict of Interest 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. Thus, supervisory approval is not necessary for organizations whose interest do not impact The Joint Commission (e.g., civic, charitable, fraternal organizations).
- All fees and/or compensation (other than reimbursement for expenses arising from Board participation) that are received for Board services provided during work time 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 4.4. 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 must be turned over to The Joint Commission.

PRINCIPLE 5. CORE ACTIVITY AND RELATIONSHIPS

Joint Commission transactions with organizations seeking to obtain or retain accreditation, 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 following standards are intended to guide Joint Commission Personnel in determining the appropriate actions or behaviors in the context of The Joint Commission's core activities and relationships. This policy should be interpreted broadly to avoid even the appearance of improper activity.

V. Core Activity and Relationships - Gifts given internationally must be given consistent with Joint Commission policies and authorized by the JCR Office of the CEO.

STANDARD 5.1. GIFTS AND GRATUITIES

The Joint Commission needs to preserve and protect its reputation at all times and avoid even the appearance of impropriety. Unless otherwise authorized, Joint Commission Personnel should not accept gifts, favors, services, or other things of value when making purchases or decisions, or acting on behalf of The Joint Commission. Similarly, Joint Commission Personnel are prohibited from offering or giving 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. Please refer to the Gift, Meals, and Entertainment Standards Policy for more information.

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 contractors that could be construed by an impartial observer as improper.

Q&A

During the holidays, Microsoft offered me Chicago Cubs tickets and gift card to a local restaurant. ***Can I accept them?***

Unfortunately, the Gift, Meals, and Entertainment Standards Policy prohibits accepting cash or cash equivalents, such as a gift card, or any kind of entertainment from a Joint Commission vendor. You should politely thank the vendor and let them know about our gift policy.

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 must not seek to gain any advantage through improper payments, business courtesies, or other inducements. Offering, giving, soliciting, or receiving any form of bribe or other improper payment is prohibited. Customary commissions, rebates, discounts, and allowances are acceptable business inducements provided that they are approved by Joint Commission management, or the CFO or their designee, and that they do not constitute illegal or unethical payments.

Q&A

Olivia gets asked 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 Olivia is part of the decision process to select the vendor, then no gift or acceptance of dinner is appropriate. However, if she is not part of a decision process, she can accept a meal from a vendor that is business-related and falls within Joint Commission reimbursement guidelines.

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, comply with Joint Commission reimbursement guidelines, and are consistent with all applicable laws.

STANDARD 5.4. RELATIONSHIPS WITH GOVERNMENT AGENCIES

Relationships with government agencies, officials, and employees must be conducted with honesty and integrity and in compliance with all applicable laws and regulations. Accordingly, Joint Commission Personnel are prohibited from offering or giving gifts when procuring goods or services on The Joint Commission's behalf. 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, various state agencies, and/or Ministries of Health. However, prior to responding to nonroutine requests from government agencies, Joint Commission Personnel should consult with senior management, the Department of State & External Relations (for state agency requests), The Joint Commission's Washington, D.C., office (for federal agency requests), or the Legal Department.

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 following standards are intended to guide Joint Commission Personnel by providing 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.

VI. Protection of Assets

- **Corporate credit cards are to be used 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.

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 must be consistent with each Joint Commission Personnel's role and responsibility and the organization's needs and resources. Joint Commission Employees should not suffer financial loss or experience financial gain as a result of business travel and entertainment. Joint Commission Employees must exercise reasonable judgment in the use of Joint Commission assets and spend the organization's assets as carefully as they would spend their own money. Joint Commission Personnel must also 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 must be conducted in a manner to further The Joint Commission's interests rather than the personal interest of any individual.

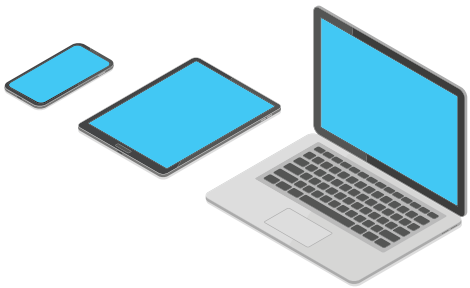
a. Joint Commission Equipment

Joint Commission portable devices, including tablets, smartphones, and laptops must be safeguarded, from loss, theft or unauthorized use. Joint Commission Personnel using these 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 non-work activity on company time or the use of The Joint Commission's assets for personal or non-work related purposes, Joint Commission Personnel must obtain approval from an appropriate manager.

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

Data gathered for or provided to The Joint Commission may be confidential and is considered a Joint Commission asset. Accordingly, Joint Commission Personnel are prohibited from using or manipulating such data in a manner which is inconsistent with Joint Commission policies or for non-Joint Commission purposes.

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.

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 must 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 must 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.

PRINCIPLE 7. WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

The Joint Commission is committed to providing a work environment that values diversity among its employees. All Human Resources policies and activities are intended to create a respectful workplace consistent with Joint Commission Safety Culture and where every individual has the opportunity to reach their highest potential. The Joint Commission gains strength from the diversity of our staff, values the contributions of each employee, encourages the development of individual capabilities, and emphasizes the importance of individual well-being. The Joint Commission has a strong commitment to cultural diversity.

The following standards provide guidance to ensure that The Joint Commission's Human Resources activities reflect high standards and remain consistent with the corporate value of teamwork, courtesy, integrity and empowerment. Leadership will inspire others to be open, fair and honest, and all staff will use teamwork and deal with others in a respectful manner. Joint Commission Personnel's conduct not specifically addressed by these standards should be consistent with Principle 7.

Q&A

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

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

STANDARD 7.1. EQUAL EMPLOYMENT OPPORTUNITY

The Joint Commission believes that fair and equitable treatment of Joint Commission Employees and all who deal with The Joint Commission is critical to fulfilling its mission, vision, and values. To further this policy, Joint Commission employees will be recruited, hired, trained, promoted, assigned, transferred, laid-off, recalled, and terminated based on their own abilities in balance with corporate needs, achievements, experience, and conduct without regard to race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, age, disability, genetic information, retaliation or any other classification prohibited by applicable law.

VII. Workplace Conduct and Employment Practices

- **Harassment or discrimination of any kind is prohibited.**
- **Our diverse and open inclusive work environment helps us better serve our customers.**

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. Enterprise behaviors reflect the three imperatives of trust, report, and improve.

b. Professional Conduct

Joint Commission Personnel are expected to use common sense and good judgment, and demonstrate professionalism in all of their employment-related dealings with customers, vendors, and co-workers, in support of the organization's mission and vision. The Joint Commission reserves the right to take disciplinary action with employees whose behaviors and actions are unlawful, violate others' rights, threaten the well-being of others, or are serious violations of company policies and work rules. 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.

c. Harassment

The Joint Commission is committed to a work environment in which all individuals are treated with respect and dignity. Each Joint Commission Employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, The Joint Commission expects that all interaction among persons who work for or on behalf of The Joint Commission will be business-like and free of bias, prejudice and harassment. No Joint Commission Personnel is exempt from this policy.

Harassment is a form of unlawful discrimination that includes all types of physical or verbal conduct which shows offensive behavior toward a person because of that person's race, color, religion, gender, national origin, age, disability, sex (including gender identity, sexual orientation, and pregnancy), or other legally protected characteristic. This physical or verbal conduct constitutes harassment/discrimination if it is intended to or creates a hostile, intimidating, or offensive working environment, unreasonably interferes with a person's work performance, or otherwise adversely impacts the terms, conditions, or opportunities of a person's employment.

All concerns regarding harassment of any kind are encouraged to be addressed at the time of occurrence and shared with the Joint Commission Employee's manager or Human Resources. Staff are encouraged to speak up in the moment and to make sure these incidents are raised so they can be addressed. The procedure to report and address harassment is stated in the Harassment Policy.

Q&A

Sammie was in a team meeting and she heard a comment which sounded offensive and harassing in nature. Because it wasn't directed at her she didn't say anything. Was that the right thing for her to do?

It's uncomfortable to hear these comments and not be sure what to do. It's okay to tell the co-worker in the moment at the meeting that the statement wasn't appropriate, if the team member is comfortable doing that. Alternatively, Sammie should report it to her manager or the HR department so it can be confidentially looked into and resolved.

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 Personnel. Joint Commission Personnel are responsible for carrying out their duties in a safe and efficient manner when working at or on behalf of The Joint Commission. All Personnel must report any unsafe conditions immediately to their manager, including any suspicious, or unauthorized person found on The Joint Commission's premises. Threats or acts of violence, abuse, or intimidation are not tolerated. The possession of firearms or any weapons is prohibited on company property. The Joint Commission is committed to a drug free workplace and prohibits Joint Commission Employees from engaging in the unlawful manufacture, distribution, dispensation, possession, sale, or use of controlled substances at the workplace, or while conducting Joint Commission business off the company's premises.

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 all Joint Commission Accreditation activities, business, and affairs in a manner consistent with the general statement of principles set forth in this Code of Conduct, in all Joint Commission Policies and Procedures, and in The Joint Commission Employee Handbook.

Responsibilities:

Responsibility	Contractor/ Partner	Employee	Leadership
Read, understand and comply with the Code of Conduct	X	X	X
Prevent compliance violations and protect the reputation of the company	X	X	X
Report concern about potential violations of any laws, regulations, the Code of Conduct or policies	X	X	X
Ensure personnel providing services or interacting with The Joint Commission read, understand, and comply with this code		X	X
Promote ethical conduct and ensure all employees are familiar with the Code of Conduct			X
Create an open environment to support employees in asking questions and making ethical decisions			X

Failure to comply with this Code of Conduct and its guidelines for behavior, or the other policies and procedures referenced herein, may lead to disciplinary action. For alleged violations, The Joint Commission will evaluate relevant facts and circumstances, including, but not limited to, the extent of the violation 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: This Code of Conduct or other policies referred herein should not be interpreted as to provide any additional employment or contract rights to Joint Commission Personnel or other persons. While The Joint Commission 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.

GETTING HELP

When an ethical question arises, all Joint Commission Personnel are encouraged to make decisions consistent with this Code of Conduct and applicable policies and to maintain the integrity of The Joint Commission. The Joint Commission's reputation rests on the strength of each individual's business conduct, so if the answer is still not clear, Joint Commission Personnel should contact their supervisor, an Officer, the General Counsel, or the Corporate Compliance Officer.

REPORTING OF POTENTIAL VIOLATIONS

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

- To their supervisor, who will report up as necessary;
- To HR at x5621, if it is an HR related issue;
- To the Security Officer through the IT Help Desk, if it is a security breach matter;
- To the Corporate Compliance and Privacy Officer at x5627 or through the "Report a Compliance Concern" online form on jNet, for all other compliance related matters;
- Call the HOTLINE at 1-844-489-1052 if anonymity is desired.

The Joint Commission will not tolerate any retaliation against employees from good faith reporting of a compliance concern. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation actions, poor work assignments, or threats of physical harm.

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.

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.

POLICIES AND PROCEDURES

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

EMPLOYEE HANDBOOK

Summarizes key HR policies with pertain to employees.

The Joint Commission

**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.**