



Rady
Children's
Health

STANDARDS OF CONDUCT



STANDARDS OF CONDUCT

Reference guide for workforce members, medical staff,
board members and volunteers



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DEAR RADY CHILDREN’S HEALTH WORKFORCE, MEDICAL STAFF, BOARD MEMBERS AND VOLUNTEERS:

As a values-based pediatric health system, we hold ourselves to the highest standards of excellence — in patient care and safety, in our interactions with one another and in our unwavering commitment to compliance with federal and state laws and regulations. Every child and family who turns to us for care places their trust in our hands. That trust is sacred, and it calls each of us to act with integrity, compassion and accountability in all that we do.

These Standards of Conduct reflect our shared commitment to ethical practice and responsible stewardship. They outline our expectations for professional behavior, provide guidance on applicable laws and policies and offer resources to help address questions or concerns that may arise in your role with the organization. These standards reflect who we are and the principles that guide our work every day.

We must hold ourselves — and one another — accountable to our enterprise values and Standards of Conduct. By setting and achieving high standards, we unleash the full potential of a unified, mission-driven organization dedicated to exceptional and innovative pediatric care. Consistently living these standards creates an environment where patients and families feel safe and respected, where colleagues feel supported and empowered and where our community recognizes us as a trusted leader in children’s health.

Thank you for your passion, your professionalism and your steadfast commitment to the children and families we serve. Because of you, Rady Children’s Health is a place where excellence thrives — a place to work, practice, volunteer, and receive care with pride and confidence.

Sincerely,



Patrick Frias, MD
Co-President & CEO,
Rady Children’s Health



Kimberly Chavalas Cripe
Co-President & CEO,
Rady Children’s Health



S. Douglas Hutcheson
Chair of the Board,
Rady Children’s Health



Lynn H. Grieves
Chief Compliance Officer,
Rady Children’s Health

MISSION

**We are here for the kids:
advancing hope, health,
and healing**

VALUES

We are Defenders of Childhood who:

- Lead with compassion
- Own excellence
- Listen with intent
- Encourage bold ideas
- Do the right thing

We are better together.



ETHICAL BEHAVIOR

Rady Children's Health (Rady Children's) is committed to carrying out our mission lawfully and ethically. Part of this commitment is our dedication to fostering an environment that promotes integrity, honesty, accountability and mutual respect. We value open, honest communication and ethical decision-making, which are essential for complying with federal and state laws, rules and regulations, internal policies and procedures, as well as maintaining safe, high-quality care. Individuals are expected to conduct themselves in a professional manner and always treat everyone with courtesy, dignity and respect. If you become aware of any issue or situation that is inconsistent with our Standards of Conduct, it is your duty to report the concern. In addition to reporting concerns to your supervisor, you can report your concerns to the Corporate Compliance Department or through the Compliance Hotline.

The Compliance Hotline is accessible to everyone - not just our workforce - and allows for anonymous reporting. Rady Children's strictly prohibits retaliation against anyone who reports concerns in good faith.

PATIENT CARE AND RIGHTS

Every Rady Children's family receives information about their rights and responsibilities. We are committed to protecting those rights at all times and encourage patients and families to participate in decisions about their care. Applying our enterprise values in daily work helps protect patients' rights and advance our mission.

Our workforce will provide quality care in a respectful, effective and compassionate manner regardless of a patient's ability to pay. Care will be delivered in accordance with each patient's individual plan of care.

Rady Children's will provide timely and appropriate care from qualified health care professionals without discrimination based on race, color, religion, socio-economic status, educational background, physical or mental disability, age, ancestry, sex, national origin, gender identity or expression, sexual orientation, veteran's status, marital status, registered domestic partner status or any other status protected by law.

CONFIDENTIAL INFORMATION

Rady Children's workforce, medical staff, board members and volunteers must protect confidential information at all times. Confidential information includes any sensitive, protected, or nonpublic information whose use or disclosure is limited or prohibited by law or policy, or that could harm Rady Children's. Confidential information includes information related to Rady Children's, our patients, our workforce, business operations and decision making.

Protecting confidential information helps Rady Children's:

- comply with state, federal and local laws;
- maintain fair competition in the marketplace;
- make informed business decisions; and
- protect the trust of our workforce and the communities we serve.

Improper use or disclosure of confidential information may result in disciplinary action, regulatory penalties, fines, litigation, loss of business or damage to our reputation.

Confidential information can exist in many forms, including:

- emails and electronic files
- verbal conversations
- printed documents and presentations
- board or management discussions

The responsibility to protect confidential information applies during and after work hours, on and off campus and even after your relationship with Rady Children's ends.

PATIENT INFORMATION

Federal and state privacy laws require Rady Children's to protect patient information. Everyone who works with or for the organization must safeguard patient privacy.

Patient information includes any information that can identify a patient. This may include demographic, contact, treatment, and payment information, whether it is written, electronic or spoken.

As a general rule, patient information cannot be accessed, used or disclosed without prior written authorization from the patient or their legal guardian - unless otherwise permitted or required by law. Common permitted uses cases relate treatment, payment and healthcare operations activities.

When patient information is used or shared, only the minimum amount necessary should be accessed to complete the task (see policy EPM RCH 11-63, Minimum Necessary Use Standard). The identity and authority of an individual requesting patient information must be verified before making disclosures in person, by phone, fax or email (see internal policies relating to the disclosure of patient information through phone, fax, and email).

Protecting patient information helps maintain the trust of our patients and families and helps ensure compliance with privacy laws and organizational policies.

Taking photographs, videos, recording audio and livestreaming in patient-care areas is prohibited, unless there is an official Rady Children's treatment or healthcare operations need, and a Rady Children's -issued device/system or a Rady Children's -approved application. If you witness anyone engaging in such activity in a manner that violates internal policy, notify your supervisor and/or the Corporate Compliance Department (see internal policies regarding the photographing and video recording of patients).

For more information on navigating patient privacy laws, please refer to Rady Children's privacy-related policies or contact the Corporate Compliance Department.

WORKFORCE MEMBER AND MEDICAL STAFF INFORMATION

Information that should be kept confidential includes passwords, access tokens and codes, payroll, benefits, salary, disciplinary records, social security numbers, bank account numbers and nonpublic personally identifiable information (i.e., phone numbers, addresses, email addresses, medical condition, family status, etc.). This information should never be accessed or disclosed unless there is a legitimate and approved business purpose. Please contact Human Resources immediately if you receive requests for this type of information.

Identification and facility access badges should be kept on your person or in a secure location at all times. Unattended and/or unlocked vehicles are not considered secure storage locations.



BUSINESS INFORMATION

The following information is confidential and must be protected:

- Strategic planning information
- Financial data
- Operational plans
- Proprietary designs (copyrights, intellectual property)
- IT systems names, configurations, and addresses
- Other non-public business information

There are other instances in which information is deemed proprietary; before taking action, discuss access or dissemination with your immediate supervisor, the Legal Department, or the Corporate Compliance Department (see the EPMRCH11-34 Confidentiality of Information policy).

COMPUTERS AND PASSWORDS

Rady Children's maintains and monitors its security systems, data back-up systems and storage capabilities to ensure all confidential and sensitive information is maintained safely and in accordance with policies, procedures and laws. All users of Rady Children's resources have an obligation to use them in a responsible manner and in compliance with all privacy and security regulations (see internal policies regarding information security).

Key points to remember:

- Disclosing or sharing login credentials or passwords, including to the Information Technology (IT) Department, is prohibited. Please contact IT if you have problems logging into a system. Immediately notify IT and change your password if you suspect your password or login credentials have been compromised.
- Anyone accessing an electronic system, including but not limited to the electronic medical record or other clinical or financial computer system, must use their unique login credentials. If anyone accesses a system using someone else's login credentials, that person's identity is documented in the system, which can lead to negative consequences. This includes policy violations as well as security and data integrity issues, such as the wrong person's name appearing in a medical record as the individual providing service.
- The use of Rady Children's computers, systems, networks and internet, including email, is subject to review and monitoring by Rady Children's at any time without notice. There should be no expectations of privacy regarding network, internet or email use.
- Log out (or tap out if using a Tap & Go or other digital access Badge) of your computer completely or secure your computer by pressing "control, alt, delete" and selecting "Lock this computer" before leaving your workstation.
- Only approved and licensed software may be installed and operated on Rady Children's equipment, and installation must be performed or managed through IT.
- The wearing of audio headsets is strongly encouraged during Rady Children's business discussions (i.e. meetings, calls, etc.), to help ensure that unauthorized parties cannot hear the conversation.
- Doors and windows should be closed during the discussion of Rady Children's business to help ensure that unauthorized parties cannot hear the conversation.
- Rady Children's assets (i.e. laptops, phones, and other equipment) can only be used by remote workers to perform Rady Children's business. Rady Children's assets cannot be shared with or otherwise used by any non-Rady Children's individual.
- Do not leave Rady Children's assets in your vehicle unattended. During transport, keep such assets out of sight, such as in your vehicle's locked trunk. In the event of theft or loss, immediately notify your supervisor and IT.

EMAILING AND FAXING PROTECTED HEALTH INFORMATION (PHI)

If you are sending PHI via email to a non-Rady Children's email address for an authorized business purpose, it must be sent using your official Rady Children's email address and it must be encrypted by manually typing "#secure#" in the email subject line or using Proofpoint Encryption (where available). It is not acceptable to use a non-Rady Children's email address to send, store or receive PHI (See internal policies regarding electronic communications).

PHISHING EMAILS

Phishing is a form of cyberattack that uses fraudulent emails to trick individuals into revealing their usernames and passwords, disclosing confidential information, and/or clicking on suspicious links or email attachments that contain computer viruses. Exercise caution when opening emails. Watch for phishing indicators such as spelling/ grammatical errors, unusual requests and threats, or a false sense of urgency. If you receive what you suspect or confirm to be a phishing email, click the "Report Phishing" icon on the top right header of Outlook or notify your regional IT Department.

FAXING

Faxes sent outside of the health system must have an official Rady Children's cover sheet that contains a confidentiality statement. PHI should be limited to the minimum necessary and the fax number must be verified before sending the fax. Fax machines should not be located in areas accessible to the public (see internal policies regarding the disclosure of patient information through fax).





CODING, BILLING, AND DOCUMENTATION STANDARDS

Many individuals are involved in the process of generating documentation necessary to accurately code and bill for the services we provide. Since billing is largely dependent on documentation of the care provided, caregivers must diligently work to ensure the accuracy and completeness of all written documentation. Rady Children's and/or our workforce could be prosecuted and/or asked to refund payments for filing inaccurate claims or providing and billing for care that is not medically necessary. Medical record documentation, coding and billing must be performed accurately and timely, in accordance with all laws, standards and rules. All supporting medical record documentation must be prepared for all services rendered.

Important reminders:

- Medical record documentation must accurately reflect what services have been provided to the patient and support the medical necessity of these services, as well as the corresponding codes selected for billing purposes. If you discover a payment error, notify your supervisor and follow refund procedures, including those identified within the internal policy on overpayments.
- Inaccurate or improper medical record documentation coding, and/or billing places Rady Children's and the involved individuals at serious risk. If you discover inaccurate or improper coding and/or billing, alert your immediate supervisor and the Corporate Compliance Department.

FRAUD, WASTE, AND ABUSE

The Rady Children's workforce must not engage in conduct that would violate healthcare fraud and abuse laws. Individuals must comply with all statutes, regulations and guidelines applicable to federal and state health care programs.

Claims and reporting documentation must be accurate, complete and consistent with government and third-party payer requirements.

Individuals must not give or receive any form of payment, kickback or bribe to influence the referral of patients or the purchase of any services. Individuals must not, or offer improper incentives to patients, providers or others to encourage patient referrals to Rady Children's or the use a particular product or service.

No one should knowingly make any false statements, verbal or written, to government agencies or other payers. Claims for health care services must be submitted only for care or services that are medically necessary and supported by appropriate documentation.

Numerous federal and state regulations address the potential for fraud and abuse within the healthcare industry, and government agencies work tirelessly to investigate matters they believe are noncompliant. These laws are technical, complex and have limited exceptions. Policies and procedures have been developed to help Rady Children's remain in full compliance with these laws. Below is a summary of key fraud and abuse laws.

ANTI-KICKBACK STATUTE

In healthcare, asking for or receiving any remuneration (kickback) in exchange for patient referrals is a crime under federal and state anti-kickback statutes. These statutes apply to payers and recipients. Just asking for or offering a kickback could violate the law. "Remuneration" is anything of value. We may not directly or indirectly pay patients, physicians, other healthcare providers, or any other individual or entity to refer patients to us.

STARK SELF-REFERRAL LAW

The Federal Stark Self-Referral Law (Stark) prohibits a physician from referring Medicare and Medicaid patients to an entity with which the physician (or immediate family member) has a financial relationship, unless an exception applies. This law is a "strict liability" statute; therefore, both intentional and unintentional violations of the law may result in negative legal consequences. The law requires all medical directorships, space and equipment leases and any other arrangements with physicians be commercially reasonable, compensated at Fair Market Value (FMV) and be formalized in a written contract.



FALSE CLAIMS ACT

Rady Children's policies, along with the Federal False Claims Act (FCA) and California False Claims Act (CFCA), prohibit false claims and other fraudulent activity. The False Claims Act prohibits conduct such as knowingly submitting a false or fraudulent claim, or using or making a false statement, to get a false or fraudulent claim paid or approved by the government (see internal policies regarding whistleblowers). Routine monitoring, reviews and audits are conducted by Rady Children's and outside sources to help prevent and detect potential fraud, waste and abuse.

Examples of fraud, waste and abuse include but are not limited to:

- Misrepresenting a diagnosis or procedure code to obtain payment
- Making false statements or representations or inappropriately altering records in order to obtain some payment or other benefit to which we would otherwise not be entitled
- Forging or changing billing-related items, such as making false claims or billing for services or supplies not rendered, not medically necessary or not documented
- Misleading or falsely reporting financial or operational records or books

INELIGIBLE PERSONS

We do not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal and state healthcare programs; suspended or debarred from government contracts and has not been reinstated in a federal or state healthcare program after a period of exclusion, suspension, debarment or ineligibility. We routinely search the Health and Human Services' Office of Inspector General and System for Award Management (SAM) lists of such excluded and ineligible persons. Rady Children's policies address the procedures for timely and thorough review of such lists and appropriate enforcement actions.



COMMUNICATION WITH GOVERNMENT AND REGULATORY AGENCIES

Rady Children's promptly cooperates with all government investigations and inquiries in a reasonable and diligent manner, while preserving our health system's legal rights. If you, whether at home or at work, are approached by a government agent or receive a subpoena or other official request for information regarding Rady Children's business, immediately notify your supervisor, or the Legal and Corporate Compliance departments.

RECORD RETENTION

Rady Children's has developed a record retention policy that meets or exceeds mandated requirements and provides guidance for the retention, maintenance, preservation and disposal of clinical, financial, employee and other records (see EPM RCH 11-63 Records Retention (Business Records) policy).

- Records containing confidential and proprietary information will be securely maintained, controlled and protected to prevent unauthorized access.
- Records that have satisfied their required period of retention and are not subject to a litigation hold will be destroyed in an appropriate and timely manner.
- Information pertaining to unauthorized destruction, removal or use of Rady Children's records or regarding falsifying or inappropriately altering information in a record or document should be reported to your manager and the Corporate Compliance Department.

CONFLICTS OF INTEREST

Conflicts of interest are circumstances in which your personal interests or activities may influence, or may be perceived to influence, your ability to act in the best interest of Rady Children's. Our Conflicts of Interest Policy outlines circumstances in which outside interests or activities, such as holding ownership interests in companies or engaging in outside employment, may create a perceived, potential or actual conflict of interest. Conflicts also include sharing, for personal gain, any confidential information belonging to Rady Children's, including but not limited to future business plans.

While performing duties and business for or in relation to Rady Children's, you must always act in the best interest of the organization and avoid conflicts of interest. Individuals are expected to fully disclose any actual or potential conflicts (perceived or otherwise) to the Corporate Compliance Department when joining the organization, as soon as they arise, and during the annual conflict of interest disclosure questionnaire. Individuals engaged in Rady Children's research are also required to complete a separate annual conflict of interest questionnaire focused on the specific regulatory requirements governing research activities.

If you are unsure whether a situation represents a potential conflict of interest, disclose it and contact the Corporate Compliance Department for help.

REQUESTING AND ACCEPTING GIFTS AND GRATUITIES

Rady Children's does not permit its workforce, medical staff, board members or volunteers to accept gifts from patients, families, visitors, vendors, physicians, or other business partners that could influence or be perceived to influence decisions or actions on behalf of the organization. Gifts include goods, services, tips, personal gratuities, cash or cash equivalents (e.g., gift cards or gift certificates redeemable for cash). Asking for gifts, regardless of the amount of money or the type of gift, is not permitted. Offering or accepting any gifts to or from any government employees, agents, representatives, elected officers or other officials is prohibited. Donations cannot in any way create an obligation or expectation for Rady Children's to engage in business with or otherwise reward the party offering the donation. The party offering the donation is responsible for disclosing to the appropriate regional Rady Children's fundraising foundation if there is any pending, ongoing or recently completed business between the party/its parent entity and Rady Children's. Unsolicited, non-cash or non-cash equivalent gifts of nominal value are acceptable under certain circumstances; please refer to the internal policy on gifts.

OUTSIDE EMPLOYMENT OR ACTIVITIES: COMPETITOR, CONSULTING OR BUSINESS OPPORTUNITIES

Rady Children's values and expectations are clear and explicit with respect to conflicts of interest pertaining to outside employment or activities involving competitors, consulting or business opportunities.

- Individuals are not permitted to work at another business where such work conflicts with their ability to perform their job or role at Rady Children's, or where the individual is in any way soliciting business while working for Rady Children's.
- It is inappropriate to own a significant financial interest in a business that competes with Rady Children's. We require disclosure in any situation where an individual, or their family member, has a direct or indirect ownership, investment interest or compensation agreement with any person or vendor with which Rady Children's has a business relationship.
- Managers and above who hold employment elsewhere must let their immediate supervisors know the names of outside employers and the nature of such employment.
- Individuals must conduct consulting services on their own time, and it must not conflict with their Rady Children's job responsibilities. Each consulting opportunity must have the advance written approval of the responsible executive leader in most cases.
- Rady Children's promotes a work environment free from direct solicitation efforts that do not relate to our business or interests. Individuals may participate in charitable fundraising activities as long as they do not individually solicit money, other items or time from our workforce and it is only done during breaks or lunch (see internal policies for more information). Individuals may not distribute literature in any work areas during working time for any purpose. Working areas are all areas in the health system, except cafeterias, gift shops, staff lounges, lobbies and parking areas
- Individuals must comply with applicable anti-trust laws and other similar laws that regulate competition and must refrain from any conspiracy or other behavior in restraint of trade. Price fixing, disparagement, misrepresentation, harassment of a competitor, stealing trade secrets, offering or accepting bribes or kickbacks are strictly forbidden.

PARTICIPATION ON OUTSIDE BOARDS OF TRUSTEES/DIRECTORS

Individuals must disclose any outside boards on which they serve as part of the annual conflict of interest questionnaire. Anyone seeking to serve on an outside board for an organization whose interests may conflict with those of Rady Children's must obtain written approval from their executive leader and/or the CEO or designee before accepting the position



PROTECTING OUR ASSETS

Individuals are expected to protect and safeguard Rady Children's property from loss, theft, misuse and destruction. In addition to material possessions, this also includes confidential information of Rady Children's, our patients, workforce, medical staff, board members, and volunteers. Individuals are prohibited from taking or using Rady Children's property for personal or non-work-related activities.

- Be honest in recording your time worked and in completing expense reports.
- Use good judgment when using Rady Children's money for travel and other expenses.
- All financial documents, including but not limited to accounting records, research reports, expense accounts and timesheets, must be prepared accurately and clearly represent the nature of the transaction. No facts should be falsified, misrepresented or omitted. Transactions between Rady Children's and outside individuals and organizations must be recorded promptly, accurately and in accordance with generally accepted accounting standards.

NOT-FOR-PROFIT STATUS

Rady Children's is a not-for-profit, tax-exempt organization. The requirements for organizations not taxed under Section 501(c)(3) of the Internal Revenue Code and similar provisions must be followed. Noncompliance with these requirements places Rady Children's at great risk of losing our 501(c)(3) status and associated privileges. Individuals are not permitted to use Rady Children's resources or property for private use or benefit. Transactions must be in the best interest of Rady Children's and negotiated at arm's length for fair market value. Individuals faced with sensitive situations should consult their immediate supervisor or the Corporate Compliance Department.

The following are examples of inappropriate actions:

- Paying medical director fees at above market value
- Leasing property to a medical group for their private practice at below market value prices
- Using Rady Children's funds or resources to solicit support of, contributions of, or opposition to a political candidate. Rady Children's Health Workforce Members are encouraged to participate in the political process by voting and supporting candidates and issues of their choice. However, Workforce Members may not do so as a representative of Rady Children's Health. In addition, no Workforce Member may pressure any other Workforce Member to contribute money to a particular candidate or cause, or pressure them to vote for a particular candidate or ballot initiative.

EMPLOYMENT PRACTICES

Rady Children's is committed to a workplace where people are treated with respect and have opportunities to grow and contribute their talents. We promote a safe and healthy work environment that supports fair treatment for everyone. Everyone who works with or for Rady Children's shares responsibility for maintaining a workplace that is safe, drug-free and free from harassment. For more information, please contact Human Resources.

Some examples of inappropriate behavior or actions in the workplace are:

- Making derogatory comments or jokes of a sexual nature
- Discriminating against or failing to promote a qualified individual based on race (including but not limited to hair texture and protective hairstyles), color, gender, religion, sex, gender identity or expression, marital status, registered domestic partner status, socio-economic status, educational background, national origin, ancestry, age, physical or mental disability, sexual orientation, veteran status or any other status protected by law.
- Refusing to hire a qualified individual because of a physical disability

- Failing to dispose of bio-hazardous or infectious waste in designated containers
- Failing to report defective equipment or unsafe conditions
- Smoking in a non-designated area (Rady Children's operates smoke-free campuses)

Rady Children's will not tolerate unlawful harassment of our workforce by leadership, co-workers or other persons doing business with our organization. Harassment takes many forms, including but not limited to, verbal statements, physical contact, posting inappropriate pictures or writings, or any other conduct that creates an intimidating, offensive, or hostile work environment. Workplace violence includes robbery, stalking, assaults and hate crimes committed by current or former employees or other people doing business with Rady Children's. Incidents of harassment or violence should be reported to Human Resources immediately. Individuals should report workplace violence concerns to their supervisor and to Security Services. If an incident poses imminent danger to anyone involved, law enforcement should be contacted immediately.

Our workforce is responsible for maintaining a safe and healthy environment and complying fully with all health and safety laws. Possessing, using, selling or being under the influence of alcohol or an illegal drug, intoxicant or controlled substance during work time or on Rady Children's owned or occupied premises is strictly prohibited.

LICENSE AND CERTIFICATION RENEWALS

Individuals, including independent contractors, in roles that require professional licenses, certifications or other credentials are responsible for maintaining the current status of their credentials. They must comply with all requirements applicable to their respective disciplines at all times. Rady Children's will not allow anyone to work in a role requiring a license or certification without a valid and current credential.



SOCIAL MEDIA

Rady Children's respects the rights of individuals to post information on social media and other online platforms during non-work time and using their own devices. At the same time, Rady Children's reserves the right to protect itself from unauthorized disclosure of information, especially that which violates its policies. Unauthorized disclosures include posting patient information or pictures and statements related to Rady Children's that includes harassment, discrimination, threats of violence, defamatory, and/or false statements, whether direct or implied (see internal policies regarding social media).

If you participate in social media for personal use on Rady Children's behalf, always be sure to:

- Respect patient privacy at all times. Do not upload photographs, videos, audio or information about patients.
- Follow the law along with Rady Children's EPM RCH 11-34 Confidentiality of Information policy.
- Follow the terms and conditions for any third-party sites.
- Remember your reputation and the reputation of Rady Children's is at stake.

Individuals may share personal opinions on social media or other public platforms, but those views should not appear to represent Rady Children's

Unless authorized, individuals should not represent themselves as spokespeople for Rady Children's.

If you speak to the media or publish or post information about Rady Children's without prior approval, you must clearly state that you are not speaking on behalf of the organization. Posts or publications should include a disclaimer such as: "The views expressed are my own and do not necessarily reflect the views of Rady Children's Health or its providers, subsidiaries or affiliates."



RESEARCH

Rady Children's supports innovative pediatric research and works to ensure all research activities are conducted responsibly and in compliance with applicable laws and regulations.

Research is governed by federal and other regulatory requirements, including oversight by agencies such as the Office for Human Research Protections (OHRP) and the Food and Drug Administration (FDA). To support compliance, Rady Children's maintains regional Offices of Research Compliance.

Research misconduct is strictly prohibited. This includes fabrication, falsification or plagiarism when proposing, conducting or reporting research.

Institutional Review Boards (IRBs) help protect the rights and safety of participants enrolled in research studies. These boards also help ensure fair and equal access to research opportunities without discrimination. Participants always have the right to refuse participation or withdraw from a study at any time.

Rady Children's does not bill research participants or third-party payors for tests, procedures or treatments that are funded by a research sponsor. Any errors must be reported and corrected promptly.

If you become aware of potential noncompliance with research requirements, notify your immediate supervisor (when appropriate) and the Corporate Compliance Department.

Research funding must be managed responsibly, and costs must be reported accurately and in a timely manner. Individuals involved in research must disclose any financial or outside business interests that could create a real or perceived conflict of interest.

Questions about research compliance should be directed to your regional Office of Research.

REPORTING CONCERNS

Rady Children's is committed to an open environment where concerns can be raised and addressed. This commitment begins with every workforce member and extends through all levels of leadership.

If you believe non-compliant or unethical activity may be occurring, you are expected to report the concern through the appropriate channels.

You will never be punished for making a good-faith report or for seeking guidance.

How to report a concern:

- When possible, first report concerns to your immediate supervisor/ manager.
- If your supervisor/manager is unavailable, or you are not comfortable speaking with them, contact the Corporate Compliance Department.
- To report a concern anonymously, call the Compliance Hotline, toll-free, at 877-862-4228.
- You may also submit a report online at app.mycompliancereport.com (Access ID: RADY).

You are expected to cooperate fully in any investigation.

Intentionally making a false report violates our Standards of Conduct and will result in appropriate disciplinary action.

NON-RETALIATION

Our Standards of Conduct outline the expected behavior of our workforce.

All good-faith reports made in accordance with the Standards of Conduct will be handled in a discrete and professional manner.

Rady Children's has a strict non-retaliation policy and does not tolerate retaliation or reprisal against any individual who in good faith reports suspected violations of law, regulation or policy, or testifies, assists, or participates in an investigation, compliance review or hearing.

Retaliation and adverse action may include discharge, demotion, suspension, harassment, denial of promotion, transfer or any other manner discriminating or threatening to discriminate against anyone.

Acts of retaliation should be reported to the Corporate Compliance Department.

CONSEQUENCES OF NON-COMPLIANCE

Everyone is expected to follow the law, our Standards of Conduct, and our policies and procedures. Employment may be contingent upon compliance with these standards.

Candidates for employment may be asked about past compliance violations.

When suspected or actual non-compliance is reported or discovered, follow-up actions may include, but are not limited to:

- Investigation of the issue;
- Development of a corrective action plan;
- Implementation of measures to prevent the issue from occurring again; and
- Disciplinary action up to and including separation from Rady Children's.



