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TITLE: Standards of Ethical Conduct Policy

1.0 PURPOSE

The purpose of this policy is to set forth standards of ethical conduct and related responsibilities for VHF Directors, Officers, employees, and stakeholders, and to inform them of their obligation to report any improper or unethical conduct.

2.0 SCOPE

The Standards of Ethical Conduct apply to all stakeholders of VHF, including Directors, Officers, Principle Investigators (PI), staff, independent contractors, agents and others associated with VHF.

3.0 POLICY

The goal of this policy is to assure and enhance the integrity, people, processes, and resources needed by all stakeholders of VHF. We believe that VHF's viability and integrity depend on the protection of our critical assets, including our people, physical assets, and our information. We also believe that our communication, internal controls, and processes must constantly adapt to the changing needs and objectives of the organization.

Per VHA Handbook 1200.17, VHF is required to collect a Conflict-of-Interest certification annually from each director, officer and key employee that certifies compliance with federal conduct and conflicts of interest laws. The certification intends to ensure that each director, officer and key employee is aware of and in compliance with the Federal laws and regulations applicable to Federal employees with respect to conduct and conflicts of interest related to performance of their functions at VHF. The Conflict-of-Interest policy outlines information to all VHF stakeholders in order to assist with their understanding of these Federal requirements.

The Standards of Ethical Conduct are codified in 5 CFR Part 2635.

VHF stakeholders are expected to conduct themselves ethically, honestly and with integrity in all dealings. This means principles of fairness, good faith and respect consistent with laws, regulations and VHF policies which govern conduct with others. Each transaction needs to be examined in accordance with the Standards of Ethical Conduct, VHF’s Conflict of Interest Policy, and all other VHF applicable policies. No unlawful practice or a practice at odds with these standards can be justified on the basis of customary practice, expediency, or achieving a "higher"

purpose.

1. Individual responsibility and accountability

VHF stakeholders are expected to exercise responsibility appropriate to their position and delegated authorities. They are responsible to each other, both for their actions and their decisions not to act. Each individual is expected to conduct the business exercising sound judgment and serving the best interests of VHF.

2. Respect for others

VHF is committed to the principle of treating others with respect and dignity. VHF prohibits discrimination and harassment and provides equal opportunities for all individuals and applicants regardless of race, color, national origin, religion, sex, gender identity, pregnancy, physical or mental disability, medical condition (cancer-related or genetic characteristics), ancestry, marital status, age, sexual orientation, citizenship, or status as a covered veteran. Furthermore, romantic or sexual relationships between supervisors responsible for the evaluation or instruction of VHF employees are prohibited. In addition, VHF is committed to creating a safe and a drug free workplace.

3. Compliance with applicable VHF policies, procedures and other forms of guidance

VHF's policies and procedures are designed to set minimum standards and to give VHF stakeholders notice of expectations. VHF stakeholders are expected to transact all VHF business in conformance with policies and procedures and accordingly have an obligation to become familiar with those policies and procedures that bear on their areas of responsibility. VHF stakeholders are expected to seek clarification on a policy if he or she finds it to be unclear, outdated or at odds with; it is not acceptable to ignore or disobey policies if one is not in agreement with them, or to avoid compliance by deliberately seeking loopholes.

In some most cases, VHF stakeholders are also governed by ethical codes or standards of their staff. It is expected that those individuals will comply with applicable professional standards in addition to laws and regulations. Professions or disciplines - some examples are attorneys, accountants, physicians and counseling staff. It is expected that those individuals will comply with applicable professional standards in addition to laws and regulations.

4. Conflicts of interest or commitment

38 U.S.C. § 7366 (c)(2) requires that each employee must certify that he or she will comply with the federal laws and regulations applicable to Federal employees with respect to conflicts of interest.

Employees and other VHF stake holders are expected to devote primary allegiance to the VHF and VHF's mission. Outside employment must not interfere with VHF's duties. Outside professional activities, personal financial interests, or acceptance of benefits from third parties can create actual or

perceived conflicts between the VHF's mission and an individual's private interests. Those VHF stakeholders with financial interests are expected to disclose conflicts in compliance with VHF's Conflict of Interest Policy and any and all applicable conflict of interest/ laws and regulations. In all matters, VHF stakeholders are expected to take appropriate steps, including consultation if issues are unclear, to avoid both conflicts of interest and the appearance of such conflicts.

5. Ethical conduct of research

All stakeholders engaged in research are expected to conduct their research with integrity and intellectual honesty at all times and with the appropriate regard for human and animal subjects. To protect the rights of human subjects, all research involving human subjects must be reviewed by an Institutional Review Board. Similarly, to protect the welfare of animal subjects, all research involving animal subjects is to be reviewed and approved by the appropriate regulatory committee prior to any activity.. VHF prohibits research misconduct of individuals engaged in research. Examples of research misconduct are: fabrication of data or results; changes or knowingly omitting data or results to misrepresent results in the research record; or intentionally misappropriating the ideas, writings, research, or findings of others. All those engaged in research are expected to pursue the advancement of knowledge while meeting the highest standards of honesty, accuracy, and objectivity. They are also expected to demonstrate accountability for sponsors' funds and to comply with specific terms and conditions of contracts, sub awards, and grants.

6. Records: Confidentiality/privacy and access

VHF is the custodian of many types of information, including that which is confidential, proprietary and private. Individuals who have access to such information are expected to be familiar and to comply with applicable laws, VHF's Non-Disclosure Policy and applicable VA directives and agreements pertaining to access, use, and protection and disclosure of such information. Computer security and privacy are also subject to both federal and state laws, VHF's rules, and the VA's directives and policies.

7. Physical Assets and Resources

All employees must protect our organizations assets, such as equipment, inventory, supplies, cash, and information. Treat assets with the same care you would if they were your own. Use our organization resources only to conduct business. No employee may commit theft, fraud or embezzlement, or misuse the organizations property.

VHF provides an array of information and technology resources intended to maximize our efficiency in carrying out your job such as: e-mail, computers, computer applications, networks, the internet, the intranet, facsimile machines, telephones, and voice mail systems. Please remember that these tools

are VHF property and must be used in a manner that is in compliance with the Code of Conduct and reflects positively on VHF and all who work here.

Occasional, limited personal use of these resources is permitted, but cannot interfere with your work performance, or the work performance of your colleagues. Such personal use cannot result in additional cost to the organization. We cannot tolerate inappropriate or illegal use of these assets and reserve the right to take appropriate disciplinary actions, as needed, up to and including termination of employment. Such inappropriate use of these resources can include the following:

Hacking

- Pirating software or video/audio files

Soliciting

- Distributing literature for outside entities
- Sending inappropriate e-mail
- Accessing inappropriate web sites (such as those advocating hate, violence, sexually explicit material, or promoting illegal activities)
- Distributing confidential, proprietary or trade secret information of VHF outside of the organization

VHF reserves the right to monitor and inspect, without notice, the use of its information and technology resources.

7. Substance Abuse

VHF strives to maintain a workplace that is free from illegal use, possession, sale, or distribution of alcohol or controlled substances. Legal or illegal substances shall not be used in a manner that impairs a person's performance of assigned tasks. Working while under the influence is a hazard to yourself and others, and it will not be tolerated. Disciplinary measures will be taken including up to termination. Refer to the Drug and Alcohol Policy for more information.

8. Media Relations

We are committed to building and maintaining effective and ongoing communications with our key stakeholders through the media. This helps ensure the organizations' s public statements express clear and factual representations. To this end, all media inquiries should be forwarded to the Chief Executive Officer unless otherwise instructed.

9. Social Media

The use of social media has grown significantly in recent times. If used appropriately, social networking websites may be new channels for sharing information regarding our products and services. However, if not done properly, use of the websites may expose you and the Organization to additional risk. Never officially post information about or discussing any product, service or other business unless approved by the Chief Executive Officer. When making purely personal posting on social media sites, employees must use the following disclaimer when discussing job-related matters, “The opinions expressed on this site are my own and do not necessarily represent the views of VHF.” If you see anything posted on a social networking website that may include misinformation or a complaint, notify the Chief Executive Officer immediately.

Violation of Ethical Standards

1. Asking Questions and Reporting Concerns

VHF aims to conduct business with the highest standards of ethics, honesty and integrity, and recognizes that you have an important role to play in maintaining this aim. If you have questions about any subject matter covered in this code, please discuss it with your management or contact the Chief Executive Officer. Any employee or worker providing services to VHF concerned about any form of illegality, improper action, or wrongdoing by our organization, its employees or its customers is strongly encouraged to report the matter.

VHF believes that any employee with knowledge of wrongdoing should not remain silent. We take all matters of illegality, improper action or wrongdoing very seriously, and you are strongly encouraged to raise incidents or behaviors that are not in accordance with the Code of Conduct, or the policies to which it refers.

2. Commitment to Non-Retaliation

Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting in good faith. Retaliation against anyone who provides information or otherwise assists in an investigation or proceeding regarding any conduct that the employee believes in good faith constitutes a violation of applicable laws or regulations, our Code of Conduct, or VHF’s related policies is prohibited and will, in itself, be treated as a violation of our Code of Conduct.

3. Reporting Channels

If you think the law or our Code of Conduct is being violated you have several options

- a) Discuss the issue with your supervisor
- b) Discuss the issue with the Chief Executive Officer

c) Contact VHF's 24-hour Ethics and Compliance Hotline via the Internet: by going to https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=50552)

or toll-free from the United States and Canada: 844-348-7610

4. Consequences of Violations

Violations of the Code of Conduct will not be tolerated. Any employee who violates the standards in the Code of Conduct may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

Any employee who knowingly makes a false allegation is subject to discipline. Additionally, anyone who deliberately provides false information or refuses to cooperate in an investigation will be subject to disciplinary action, up to and including loss of employment.

Any leader who fails to take appropriate actions after receiving a report of a suspected violation of our Code of Conduct may be subject to disciplinary action.

4.0 DEFINITIONS

None.

5.0 RESPONSIBILITIES

5.1 VHF Board of Directors: The VHF Board of Directors is responsible for the overall policy, planning, and coordination of all VHF activities. within the VA Pittsburgh Healthcare System.

5.2 Chief Executive Officer: The VHF CEO is responsible for developing, administering, and coordinating a business process that provides optimal internal controls for VHF and ensuring that all employees follow the policies defined in the policy.

5.3 Employees are responsible for:

(1) Becoming familiar with and adhering to the laws and rules of ethical conduct and related responsibilities as described in this policy and VHF's COI Policy. Employees should consult with the VHF Administration for advice or assistance in interpreting and applying these standards. Employees who fail to exercise good judgment in conduct matters, and who violate the rules and principles on which they are based, may be subject to disciplinary or adverse action.

(2) Certifying understanding and compliance with the VHF Standards of Ethical Conduct and Related Employee Responsibilities.

(3) Following the guidelines of the Whistleblower Policy when warranted by observation of violations of the Standards of Ethical Conduct.

5.4 Supervisors are responsible for:

(1) Discussing this policy with each employee individually or in groups and providing a copy to each employee upon hire as a VHF employee. All VHF employees are required to have a Without

Compensation (WOC) appointment. This appointment requires that each employee abide by the Standards of Ethical Conduct policies of their respective VA facility.

(2) Initiating or recommending appropriate corrective action when an employee violates conduct rules or the principles on which they are based.

6.0 PROCEDURE

6.1 Maintain all signed Standards of Ethical Conduct forms and confirm receipt for each VHF board member, officer, and employee.

6.2 Take corrective action and prepare a report to the VHF Board within seven (7) days of any notification of violations.