



Dear Colleagues:

Cleveland Clinic has a worldwide reputation for clinical excellence enhanced by innovative research and education for medical leadership. We have earned the confidence of our patients and respect of our community by the ethical conduct of our practices.

The name Cleveland Clinic must always stand for honesty and integrity at the highest level. To assure this, I am pleased to introduce the Cleveland Clinic Code of Conduct.

The Cleveland Clinic Code of Conduct is part of our overall program of Corporate Compliance. It states the ethical principles that rule our business and determine our actions in the workplace. Medical and business decisions can be complex. The Code of Conduct is a plain guide to making the right choices.

All Cleveland Clinic trustees, staff, employees, volunteers and service providers are required to observe this Code of Conduct, abide by our legal and regulatory compliance policies, and conduct their activities in an ethical manner.

When you have finished reading the Code of Conduct, please sign the Acknowledgement Form confirming that you have received and read the Code of Conduct, and are committed to adhering to its terms.

If you have any questions about the Code of Conduct, or ethical concerns regarding any situation arising at Cleveland Clinic, please contact your supervisor, the Department of Human Resources, the Office of Corporate Compliance, or the Office of General Counsel. If you wish to remain anonymous, you may call the confidential Reporting Line at 1-800-826-9294, or for the regional hospitals at 1-216-521-2947.

Thank you for all that you do to put patients first, and your support of quality, innovation, teamwork and service at Cleveland Clinic.

Sincerely,

A stylized, handwritten signature in black ink, consisting of a large 'D' followed by several loops and a long horizontal stroke.

Delos M. Cosgrove, M.D.
Chief Executive Officer and President, Cleveland Clinic

Our Mission

Is to provide better care of the sick, investigation of their problems and further education of those who serve

Our Four Cornerstones that Support "Patients First"

Quality
Teamwork
Innovation
Service

Five fundamental values form the foundation of the Cleveland Clinic culture:

Quality
Integrity
Compassion
Collaboration
Commitment

Purpose

Cleveland Clinic has a tradition of ethical standards in the provision of health care services as well as in the management of its business affairs. The Code of Conduct supplements the mission, vision and values of Cleveland Clinic, and applies to all who provide services under the auspices of Cleveland Clinic and its affiliates.

Our Code of Conduct, which has been adopted by the organization, provides guidance to all in carrying out daily activities within appropriate ethical and legal standards. The Code of Conduct provides standards of conduct to protect and promote integrity and to enhance Cleveland Clinic's ability to achieve its mission and compliance goals.

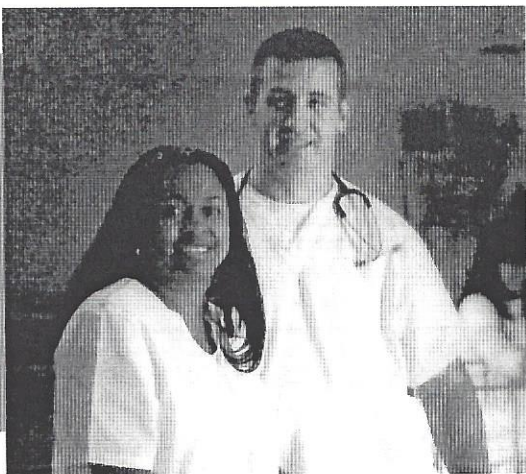
The Code of Conduct is part of Cleveland Clinic's general Compliance Program. Policies and procedures that support the Code can be accessed on the intranet or obtained from a supervisor in hard copy form.

Who Should Read This?

The Code of Conduct must govern the actions of Cleveland Clinic and its affiliates. By reviewing this Code of Conduct, participating in training courses, and reading policies, employees and other service providers become familiar with the job specific legal requirements and recognize circumstances that may raise issues.

All employees and other service providers are required to sign the Acknowledgement Form confirming that they have received and read the Code of Conduct, and are committed to adhering to its terms.





Code of Conduct:

Seven Principles

1. Legal and Regulatory Compliance
2. Business Ethics
3. Conflicts of Interest
4. Appropriate Use of Resources
5. Confidentiality
6. Professional Conduct
7. Responsibility

1. Legal and Regulatory Compliance

All activity by or on behalf of Cleveland Clinic is to comply with all federal, state and local laws and regulations.

Adherence to Health and Safety Laws

Cleveland Clinic employees and other healthcare providers are expected to comply with laws designed to improve workplace safety, such as properly controlling and monitoring dangerous materials and maintaining safe equipment.

Environmental Protection

Employees are to dispose of all waste and other materials and store all chemicals and substances in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all governmental authorities in the event of an environmental incident.

Prohibition of Discrimination and Harassment

Cleveland Clinic does not discriminate with regard to race, color, religion, gender, sexual orientation, pregnancy, marital status, age, nationality, ethnicity, ancestry, disability, or status as a disabled or Vietnam era veteran. Cleveland Clinic also does not tolerate harassment.

Regulation of Controlled Substances

Many prescription drugs, controlled substances and other medical supplies are governed and monitored by specific regulatory organizations and are to be administered by physician order only. Prescription and controlled medications and supplies are to be handled properly and only by authorized individuals to minimize risks to Cleveland Clinic and to patients.

Screening of Excluded Individuals

Cleveland Clinic will not knowingly employ or contract with individuals or entities that have been listed as debarred, excluded or otherwise ineligible for participation in Federal

health care programs. As a condition of employment, employees are required to notify Human Resources immediately if they are currently, or to the best of their knowledge, will be in the future, listed by the Federal Department of Health and Human Services Office of Inspector General, or the General Services Administration, as a person who is excluded from participation in Federal health care programs.

Not-For Profit Tax-exempt Status

Cleveland Clinic is a tax-exempt entity because of its charitable mission. Cleveland Clinic provides community benefits that include healthcare services, medical training, education, research and community outreach activities. Cleveland Clinic must use its resources in a manner that furthers the public good rather than the private or personal interests of any individual or entity.

2. Business Ethics

Cleveland Clinic is committed to the highest standards of business ethics and integrity, and requires honesty when representing Cleveland Clinic. Cleveland Clinic is committed to ensuring that its billing and reimbursement practices comply with applicable federal and state laws, regulations, guidelines and policies and that all billing is accurate.

Accurate Books and Accounts

Cleveland Clinic payments and other transactions are to be properly authorized by management, and are to be accurately and completely recorded in accordance with generally accepted accounting principles and established corporate policies. This serves as a basis for managing the business and is important to meeting obligations to patients, suppliers and others. Cleveland Clinic's high standard of accuracy and documentation is necessary for tax and financial reporting requirements.

The duty to report accurate and truthful information also applies to our internal dealings. All work-time and expenses records are to be reported accurately and honestly.

Anti-Kickback/Bribes

Cleveland Clinic prohibits its employees and other service providers from offering, paying, asking for, or accepting any money or other benefit in exchange for patient referrals, purchases, leases or orders. All contracts and other referral sources are to follow all applicable laws.

Antitrust

Cleveland Clinic engages in activities that are subject to state and federal antitrust laws. Generally, these laws prohibit competitors from entering into agreements to fix prices or to reduce price competition. Cleveland Clinic employees should not provide information about Cleveland Clinic business to a competitor. In addition, employees are to refrain from engaging in unfair practices that might restrict competition.

Billing

Billing is to comply with all applicable laws, rules and policies. Employees who handle patient charges, claims and records are to accurately document and report services and supplies. Cleveland Clinic prohibits its employees or agents from knowingly presenting, or causing to be presented, claims for payment or approval, which are false, fictitious or fraudulent.

Fraud, Waste and Abuse

Cleveland Clinic policies and various federal and state laws prohibit fraudulent claims activity. The Federal False Claims Act and state fraud and abuse prevention laws prohibit 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. Other laws governing Medicaid program integrity also look for ways to reduce fraud and abuse. Cleveland Clinic and its employees and other service providers can be prosecuted for filing inaccurate claims for reimbursement, and can be subject to civil fines, criminal penalties or both.

Cleveland Clinic expects employees to report known or suspected activity of this type to the Corporate Compliance Office. Employees who lawfully report false claims or other fraudulent conduct or who otherwise assist in an investigation, action or testimonies are protected from retaliation to the furthest extent possible under both federal and state laws.

Performing routine audits or reviews and monitoring, along with internal controls, help Cleveland Clinic prevent and detect fraud, waste and abuse.

Gifts and Gratuities

Employees are prohibited from soliciting tips, personal gratuities or gifts from patients or vendors.

Intellectual Property

Cleveland Clinic is committed to adhering to all applicable intellectual property laws. Additionally, Cleveland Clinic will respect the intellectual property and copyright laws regarding

books, trade journals, magazines and other applicable resources. All software used in connection with Cleveland Clinic business must be properly licensed, and used in accordance to that license.

Marketing and Advertising

Marketing and advertising activities may be utilized for the following purposes: to educate the public, to provide information to the community, to increase awareness of our services, and to recruit employees. Marketing material and media announcements are to be presented in a truthful, fully informative, and non-deceptive manner.

Research

Cleveland Clinic is committed to following ethical standards in full compliance with Federal and state laws and regulations in any research, investigations and clinical trials conducted. Cleveland Clinic is committed to integrity in disseminating appropriate, valid scientific results in accordance with applicable regulations and guidelines. It is Cleveland Clinic's priority to protect the rights of its subjects. As in all financial accounting and record keeping, Cleveland Clinic's policy is to submit accurate and complete costs related to research grants.

Travel and Entertainment

Travel and entertainment expenses of an employee must be consistent with his/her job responsibilities and the needs and resources of Cleveland Clinic. Employees are encouraged to participate in and attend educational workshops, seminars and training sessions.

3. Conflicts of Interest

Employees and other service providers owe a duty of complete loyalty to Cleveland Clinic and may not use their positions to profit personally at the expense of the organization, financially or otherwise. Potential conflicts of interest should be directed to the Office of General Counsel for evaluation.

Family and Work

Employment of immediate relatives (including a spouse, parent, stepparent, children, stepchildren, sister, brother, son-in-law, daughter-in-law, sister-in-law, brother-in-law, mother-in-law, father-in-law) is not permitted where an employee has or would have direct or indirect administrative, supervisory or decision-making authority over the related person.

Insider Trading

No employee of Cleveland Clinic shall use non-public information acquired through employment at Cleveland Clinic to trade in the securities of any company, or buy or sell any property or assets.

Outside Activities and Employment

Cleveland Clinic employees and other service providers who hold positions of trust and stewardship should refrain from directly or indirectly performing duties, incurring obligations, or engaging in business or professional relationships where there would appear to be a conflict of interest. No outside activity may interfere with job performance.

Political Activity

Cleveland Clinic does not participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for political office. While Cleveland Clinic supports employee participation in the political process, employees are not permitted to use positions in the organization to try to influence the personal decisions of others to contribute, or to otherwise support political parties or candidates, except as lawfully permitted through political action committees. Cleveland Clinic may choose to support specific issues with the approval of the Office of General Counsel.

Proprietary Information

Cleveland Clinic closely controls the dissemination of proprietary information. Except as specifically authorized by management pursuant to established policy and procedure, an employee should not disclose to any outside party any non-public business, whether financial, personnel, commercial or technological information, plans or data acquired during employment at Cleveland Clinic.

4. Appropriate Use of Resources

Those affiliated with Cleveland Clinic have a duty to preserve and protect the assets of the system and to ensure their efficient use. Theft, carelessness and waste have a direct impact on the organization's success. As a rule, Cleveland Clinic prohibits the personal use of its property. Employees may not use equipment, supplies, materials or services for non-work-related purposes. Employees have no expectation of personal privacy in connection with personal or work use of Cleveland Clinic electronic resources.

Resources and Contact Information

Violations or suspected violations of the law, Cleveland Clinic policy or this Code should be reported. The Compliance Reporting Line is intended to supplement, not replace, other channels for communicating questions and concerns within the organization. It should be used when other avenues of communication have been exhausted or you are uncomfortable with disclosing your identity when reporting a concern. The call will not be traced or recorded. Anonymity, if requested, will be protected up to the limits of the law.

5. Confidentiality

Employees and those affiliated with Cleveland Clinic are obligated to maintain the confidentiality of patients, personnel and other proprietary information, as well as with those who enter into business or professional relationships with Cleveland Clinic. As such, employees are trusted with a wide spectrum of confidential information, which remains the sole property of Cleveland Clinic. Sharing of confidential information with other employees or others outside the organization is strictly forbidden, unless the person requesting the information has a legitimate reason to know it for Cleveland Clinic business-related purposes.

Media Relations

All requests from reporters or the general public for information should be referred to the Media Relations Office. Employees should never release information without the permission of Media Relations.

6. Professional Conduct

Cleveland Clinic also has codes of conduct that address specific healthcare professional responsibility to patients and to each other.

7. Responsibility

Violations of the responsibilities outlined in this Code of Conduct and Cleveland Clinic policies and procedures can lead to disciplinary action, up to and including dismissal. Conduct that violates the law also may result in civil and criminal penalties ranging from fines to imprisonment.

Reporting

Employees and those affiliated with Cleveland Clinic have a responsibility to report any suspected or actual violation of the Code of Conduct or other policy irregularities to a supervisor, the Corporate Compliance Office, or the Office of General Counsel. For those who wish to remain anonymous, the report may be submitted through one of the Cleveland Clinic Compliance Reporting Lines. There will be no negative consequences or retaliation for good faith reporting of possible misconduct.

Chief Integrity Officer _____	1-216-444-3692
Compliance Office for Florida _____	1-954-659-6165
Corporate Compliance Director _____	1-216-444-1709
Law Department _____	1-216-448-0200

System-wide Reporting Line

Main Campus, Florida and other facilities _____	1-800-826-9294
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Code of Conduct Acknowledgement Form

Go to the Center for Online Medical Education and Training (COMET) intranet site,
<http://intranet.cchs.net/onlinelearning> to enter your acknowledgement electronically.

If you do not have computer access, contact your manager for instructions for completing the acknowledgment.

I acknowledge that:

- I have received the Cleveland Clinic Code of Conduct and understand that it is my responsibility to read and comply with the legal and ethical practices contained in the Code of Conduct.
- I have responsibility to report potential compliance issues to a supervisor, contact the Corporate Compliance Office, or call the Compliance Reporting Line.
- I am aware that violations of the Code of Conduct and Cleveland Clinic's policies and procedures may result in action that deals with my behavior.

Printed Name _____

Signature _____ Date _____

Title or Position _____

Employee ID # _____ Phone Number _____

Facility _____

Institute/Division/Department _____

Director/Manager/Supervisor _____