Dear Colleagues,

The Medical College of Wisconsin (MCW) strives for excellence in the services we provide and the spirit in which we provide them. MCW is dedicated to meeting the highest standards as we treat our patients, conduct research, train the next generation of health care providers, and engage with the community to improve health.

To help us meet and maintain these high standards, we have established this Code of Conduct (Code). This Code is intended to provide an honest, clear and transparent description of what we believe in, how we conduct our activities and what we expect of all MCW trustees, faculty, staff, trainees and students. MCW is committed to routinely reviewing and updating this code to ensure it remains current and relevant. There is a section at the end of this document that references many of the corresponding MCW policies.

This Code was developed from the collective efforts and input of faculty, staff, trainees and students, and will help ensure that high standards of conduct are upheld across MCW in all of our daily actions. All MCW trustees, faculty, staff, trainees and students are required to observe this Code of Conduct. Also, it is our expectation that volunteers, interns, observers and those performing similar roles, as well as those with whom we do business, act and perform services in a manner that is consistent with this Code of Conduct.

At the Medical College of Wisconsin, our people are our greatest asset. Our success depends on our commitment to the shared standards described in this Code and a commitment to each other. By demonstrating honesty, integrity and respect in every action we take and holding ourselves to the highest possible standards, we will continue to earn the trust of our patients, students, colleagues, collaborators, business partners, government entities and the community.

Thank you for your role in strengthening and sustaining the standards described in this Code and for all you do to uphold our integrity and core commitments as we pioneer pathways to a healthier world.

John R. Raymond, Sr., MD
President and CEO
Medical College of Wisconsin
PURPOSE

This Code of Conduct (Code) supplements MCW’s mission and is a foundation for ensuring that we conduct ourselves with integrity and respect and within appropriate ethical and legal standards in our daily activities. This Code includes five broad categories of principles:

1. Acting with Integrity and Respect
2. Excelling in our Missions
3. Safeguarding Our People, Resources and Information
4. Embracing Business Ethics
5. Interacting Appropriately with Third Parties

This Code applies to all MCW trustees, faculty, staff, trainees and students, collectively referred to as “we” throughout this document. Also, it is our expectation that those with whom we do business act and perform services in a manner that is consistent with this Code of Conduct.

The Code does not cover every situation. Instead, it provides broad guidelines that are detailed in laws, or MCW policies and procedures. Information is provided at the end of the Code on where to go with questions or to report concerns, as well as how to access our policies and procedures.

MISSION

We are a distinguished leader and innovator in the education and development of the next generation of physicians, scientists, pharmacists and health professionals; we discover and translate new knowledge in the biomedical and health sciences; we provide cutting-edge, collaborative patient care of the highest quality; and we improve the health of the communities we serve.
1 Acting with Integrity and Respect

Compliance with the Laws
MCW and its faculty, staff, trainees and students comply with all applicable laws, accreditation standards and policies. Here and throughout this Code, “Laws” include federal, state and local statutes, codes, rules, regulations, ordinances, orders, judgements and regulatory guidance documents.

Reporting Violations and Protections from Retaliation
We immediately report, in good faith, any known or suspected violations of this Code, ethics, applicable Laws, accreditation standards, policies or contracts. MCW has a non-retaliation and non-retribution policy. MCW does not retaliate against those who make good faith reports; rather, MCW encourages anyone to come forward with any concerns.

Commitment to Non-Discrimination and Equal Opportunities
MCW will not discriminate against its faculty, staff, trainees or students in how we select, hire or admit, evaluate, reward or determine dismissals, in accordance with and adherence to our Nepotism policy, and legally protected characteristics such as race, gender identity, sexual orientation, age, disability status or protected veteran status. MCW is committed to upholding all Laws and fostering an environment free from all forms of discrimination and harassment.

Professionalism
MCW recognizes that professional conduct from all members of its community is essential to advancing our missions of patient care, research, education and community engagement. We demonstrate professionalism by acting with integrity and respect, striving for excellence in all we do and practicing magnanimity in our collaboration with one another and with the communities we serve. These behaviors embody who we are as faculty, staff, trainees and students, and pervade all that we do at MCW.

Inclusion and Equity
At MCW, we believe that seeking and embracing diversity of people and perspectives is key to our engagement, growth and success. We value the unique backgrounds, identities and talents of each member of our community. As such, we will provide an environment that honors the dignity of all who study, train and work at MCW as follows:

- We listen to all voices with openness to multiple and diverse points of view
- We resolve conflicts with a spirit of civility
- We strive to be aware of our biases and to respond with curiosity and positive engagement with others
- We practice equity in supporting the development and advancement of members of the MCW community.
2 Excelling in our Missions

Excellence in Teaching and Education
Excellence in basic, biomedical and health sciences education and training is a core mission of MCW. We pride ourselves on providing cutting-edge educational and training opportunities for all those involved in research and health care delivery – from beginning health care students to those well-established in their careers. Civically minded, we are also committed to educating our patients and the community at large. We recognize our role as a higher education anchor. Through education, we seek to be a transformative force in our community, in our country and in our world.

Quality of Care and Patients’ Rights
MCW is committed to upholding the dignity of all of our patients, including the most vulnerable, and providing high-quality, transparent and compassionate care. We respect the rights of our patients and/or their surrogates (as appropriate) to actively engage in decision-making, including the right to refuse care, and recognize our duty to facilitate collaborative decision-making.

Innovation and Excellence in Research
MCW is committed to fostering innovation and excellence in all biomedical research we conduct. We adhere to the belief that research should be conducted and the results of research disseminated in accordance with the highest professional standards, including intellectual honesty, accurate reporting of methods and results, appropriate acknowledgement of the contributions of others, and maintenance of confidentiality. We follow all Laws and MCW policies in the conduct of research. We are committed to following ethical standards in all research activities.

Commitment to the Community
Community engagement is a core mission of MCW. We seek to be a vital partner in creating healthy, thriving communities as we find innovative ways to promote the health and well-being of people throughout Wisconsin. We strive to reaffirm the trust of our patients, collaborate with colleagues outside our institution, and forge authentic partnerships within our community.
Safeguarding our People, Resources and Information

Safe Work Environment
MCW is committed to providing a safe workplace and learning environment. We work to promote a culture that is caring, healthy and respectful of others. MCW does not tolerate harassment of any kind, or threats or acts of violence within any location in which we operate.

Protection and Use of Resources
We invest, safeguard and use our resources to further our missions. We strive to exhibit fiscal stewardship through the prudent use of resources, including financial assets, physical property, intellectual property and employee effort. We protect our resources against loss, theft, misuse, damage or destruction.

Security and Use of Technology
MCW protects its technology resources and information with a blend of modern policies and procedures and industry-leading security solutions. Faculty, staff, trainees, students and all individuals authorized to access these resources must conduct themselves in a responsible, ethical and legal manner. The use of MCW’s technology resources is aligned with and serves our institutional missions.

Recordkeeping
We store records in a safe and secure manner. We retain records for an appropriate period of time, in accordance with applicable Laws and our record retention policies. We never falsify, misrepresent or delete facts from any record.

Confidentiality of Information
We protect the confidentiality, privacy and security of the information we collect and maintain. Our commitment to the protection of this information reflects the importance we place on maintaining the trust of our patients, employees, students and communities we serve. These protections extend to all forms of communication and the mediums they use. Information should be accessed and used only to the extent necessary to conduct one’s duties.

Intellectual Property and Proprietary Information
We abide by all Laws and MCW policies related to proprietary and confidential information and intellectual property. Intellectual property includes patents, trademarks, copyrights and trade secrets. MCW’s intellectual property is protected from unauthorized use, including theft.
Embracing Business Ethics

Preventing Fraud, Waste and Abuse
MCW is committed to the timely, complete and accurate documentation, coding and billing of medical services. MCW uses its best efforts to submit only accurate claims and reports to governmental authorities and does not knowingly make false or deceptive statements.

Business Transactions and Financial Reporting
We ensure all business transactions are properly authorized and recorded in accordance with applicable policies. We maintain and report complete, accurate and reliable financial information in accordance with generally accepted accounting principles. We cooperate fully with internal and external auditors and any regulatory agencies that examine our books and records. We maintain a system of internal controls to prevent fraud and ensure accuracy and completeness in documenting, maintaining and reporting financial information.

Fair Business Practices
We conduct ourselves in an ethical manner and demonstrate honesty and integrity in all dealings. We comply with all applicable state and federal antitrust Laws and conduct business in a manner that promotes fair competition. We select suppliers and service providers on the basis of quality, cost-effectiveness and appropriateness, in accordance with applicable policies. We do not accept or offer anything of value in exchange for business or patient referrals.
## Interacting Appropriately with Third Parties

### Conflicts of Interest

We avoid involvement in any decisions where we have a self-interest in the outcome or the decision could adversely influence our judgment, objectivity or loyalty in performing our duties for MCW. We avoid even the appearance of a conflict of interest by immediately disclosing pertinent facts and abiding by the decision of leadership regarding potential conflicts. Nominal gifts that do not compromise our performance may be accepted; however, we do not offer, solicit or accept any gifts or gratuities that may influence, or appear to influence, our objectivity in performing our duties at MCW.

### Political Activity, Lobbying and Contributions

MCW is a nonprofit organization, and the MCW Office of Government and Community Relations is responsible for all lobbying and other government advocacy at the federal, state and local level in accordance with respective Laws. MCW encourages all members of its community to be active and informed citizens. We follow MCW’s policy to ensure the positional views we express are not attributed to MCW. The use of MCW property, resources or funds to personally support a political position, party or candidate for public office is prohibited. We do not use MCW assets or our work time to personally support any political or advocacy activities not approved by MCW.

### Spokesperson, Media Relations, Social Media

We release information to the media and public according to MCW Official Spokesperson policy and where required only through the appropriate channels. Faculty, staff trainees or students should never release information to the media or public without the permission of the Office of Communications. All requests from reporters should be referred to the Office of Communications. We are informative, honest and truthful in all marketing and advertising practices. MCW supports the use of social media by its community members. We are professional and use good ethical judgement and adhere to MCW’s Social Media policy when posting to optimize the social media network and foster a positive image for ourselves and MCW. We recognize that our business and personal postings on social media can impact views and opinions of MCW and potentially have unintended consequences to our professional careers.

### Responding to Inquiries from Government Entities

MCW cooperates with and responds as appropriate to any request or inquiries by a government agency. We must cooperate fully with any audit, inquiry or investigation undertaken at MCW’s direction by its attorneys, investigators, internal auditors or compliance personnel.
NAVIGATING & REPORTING CONCERNS

There may arise situations in which you believe a standard described in this Code is not being followed. Some options for deciding where to take your concern and determining how to proceed include discussion with your direct supervisor or others in leadership positions at MCW, or contacting the MCW Corporate Compliance Office.

MCW has developed a tool to help guide you in reporting concerns to the appropriate administrative offices. This tool may be accessed at: Concern Navigation Tool. In addition, the Ombuds Office is also available to assist faculty and staff with navigating reporting options.

If you do not wish to report a compliance concern internally, you may report your concern through the MCW Confidential Reporting Hotline, which is administered by a third-party vendor that specializes in the intake and management of any compliance concern:

1-844-703-8171 or mcw.ethicspoint.com

Calls to the Reporting Hotline cannot be traced. Callers do not need to identify themselves; however, they may do so in order to help give further information about the situation.

MCW evaluates all concerns promptly, thoroughly and fairly, and we do not act on any reported concern until it is validated. In addition, we protect the confidentiality and other rights of individuals involved in any reported concern or complaint.
Although not an exhaustive list, the following is a set of MCW policies most directly related to the Standards described within this Code. A complete list of all MCW Corporate Policies may be found on InfoScope.

1. **Acting With Integrity and Respect**

   **Compliance with the Laws**
   - AD.CC.020 - Compliance Reporting, False Claims and Whistleblower Protections

   **Reporting Violations and Protections from Retaliation**
   - AD.CC.020 - Compliance Reporting, False Claims and Whistleblower Protections

   **Commitment to Non-Discrimination and Equal Opportunities**
   - AD.CC.050 - Anti-Harassment and Non-Discrimination
   - AD.CC.080 - Prohibiting Sexual Harassment and Abuse in Education Programs
   - HR.EE.010 - Equal Employment Opportunity and Affirmative Action
   - HR.EE.110 - Nepotism

   **Professionalism**
   - AD.CC.060 - Professional Conduct Policy
   - MCW Professionalism Code

2. **Excelling in our Missions**

   **Excellence in Teaching and Education**
   - ED.GN.040 - Continuing Education in the Health Professions
   - ED.GN.060 - University (All Student) Handbook

   **Quality of Care and Patients' Rights**
   - CL.CP.010 - Disclosure of Unanticipated Patient Outcomes
   - CL.CP.040 - Credentialing of MCW Providers

3. **Safeguarding our People, Resources and Information**

   **Safe Work Environment**
   - CO.PS.040 - Workplace Violence Preventions
   - HR.EE.060 - Drug Free Workplace

   **Protection and Use of Resources**
   - BF.CN.040 - Fixed Asset Policy

   **Security and Use of Technology**
   - IT.IS.030 - Use of Electronic Equipment
   - IT.PI.050 - Usernames and Passwords
   - IT.PI.060 - Login and Logout Procedures
   - IT.PI.130 - Workstation Use and Security
   - IT.PI.200 - Encryption for Electronic Protected Information - Mobile Devices

   **Recordkeeping**
   - AD.LG.020 - Document Retention
   - CL.CP.080 - Open Epic Medical Records

4. **Embracing Business Ethics**

   **Preventing Fraud, Waste and Abuse**
   - CL.BC.010 - Billing-Documentation
   - CL.BC.040 - Documentation, Coding and Billing Services to Medicare
   - CL.BC.050 - Documentation, Coding and Billing Services to Medicaid

   **Business Transactions and Financial Reporting**
   - BF.PA.010 - Business Purchases, Payments and Reimbursements

5. **Interacting Appropriately with Third Parties**

   **Conflicts of Interest**
   - AD.CC.030 - Conflict of Interest - General
   - AD.CC.040 - Conflict of Interest - Health Care Industry Product Interactions
   - AD.LG.080 - Philanthropic Gift Policy
   - RS.GN.020 - Financial Conflicts of Interest in Research

   **Political Activity, Lobbying and Contributions**
   - AD.CR.050 - Advocacy Activities/Official Spokesperson

   **Spokesperson, Media Relations, Social Media**
   - AD.CR.050 - Advocacy Activities/Official Spokesperson
   - AD.CR.070 - Social Media Policy

   **Responding to Inquiries from Government Entities**
   - AD.LG.040 - Subpoenas and Service of Process

**NAVIGATING AND REPORTING CONCERNS**

- AD.CC.020 - Compliance Reporting, False Claims and Whistleblower Protections
- AD.CC.070 - Ombuds Office