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# Code of Ethics and Business Conduct

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[corporatecompliance.org](http://corporatecompliance.org)  
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## ***Dear Colleagues,***

SCCE & HCCA is the global leader in representing, supporting, and advocating for the compliance and ethics profession. It is an enviable position and an honor.

With this honor comes considerable responsibility that we are proud to assume. We must continually demonstrate that we are worthy of our members' trust. When it comes to compliance, we must live up to the best practices we teach.

Our academies teach that one of the central pillars of a compliance and ethics program is a code of conduct. This document is so much more than just another policy. It is an opportunity for organizations, including SCCE & HCCA, to demonstrate and document an unwavering commitment to a culture of compliance and integrity.

It is in this spirit that I am pleased to provide you with our Code of Ethics and Business Conduct (the Code). We intend for this to be a guide for how we work together and serve our members, and the kind of organization we strive to be.

How this code of conduct evolves from a policy to a culture is based on our collective behavior. The Code provides guidance on acceptable and unacceptable actions. But not every situation can be addressed in a code. This is where your judgment and your commitment to integrity come into play.

We are an association that lives and breathes compliance, ethics, and integrity every day. That doesn't make us immune to lapses, and missteps in our organization could be scrutinized more than they would for others. So we are counting on everyone to exercise sound judgment in decision-making, to treat everyone with respect and dignity, and to ask questions when confronted with ethical dilemmas. Please refer to the Who to Contact section of the Code if you ever witness or experience unethical behavior. We want to know about it so we can address it promptly and properly.

Every SCCE & HCCA employee, regardless of title, location, or position, must read and understand the Code and follow it without exception every day. In that regard, we view the Code as a living document that each of us is expected to embody. Please familiarize yourself with the Code and join me in committing to the spirit it conveys. And if you ever have any questions or concerns, I really do want to hear from you.

Thank you for being a part of SCCE & HCCA and your commitment to integrity both for our organization and for our members.

*Regards,*  
*Gerry Zack*



***Gerry Zack***  
***CEO, SCCE & HCCA***

## **Introduction**

The Society of Corporate Compliance and Ethics & Health Care Compliance Association (SCCE & HCCA) is valued for the services offered and trusted for the way we deliver these services to the community we serve.

We must all live up to the standards set out in our Code of Ethics and Business Conduct (Code), Employee Handbook, and supporting policies. We must ensure that SCCE & HCCA continues to be an organization that is valued and trusted by our staff and the professional community we are proud to serve.

## **Persons Covered Under This Code**

This Code applies to all full- and part-time employees and board members worldwide. All are required to be aware of and conduct their activities in accordance with this Code. We expect all to be prepared to exercise good judgment and common sense, and always be in compliance with applicable laws when deciding the right actions to take in every situation. Any failure to comply with this Code, its supporting policies, or the laws and regulations of the country/state in which we work or do business will be fully investigated, and appropriate action will be taken. This may include retraining, discipline, or other corrective action, up to and including termination of employment.

## **Employment Principles**

SCCE & HCCA is committed to promoting and maintaining a culture of respect and equal opportunity where individual success depends solely on personal ability and contribution. SCCE & HCCA maintains an Equal Employment Opportunity Policy that is an essential part of its overall commitment to attract, hire, and develop a strong, talented, and diverse workforce. Thus, SCCE & HCCA will take steps to ensure that all employment practices are free of discrimination.

## **Professional Conduct**

SCCE & HCCA believes that all persons should be treated with respect and dignity. SCCE & HCCA prohibits discrimination, harassment, or bullying against any person because of age, ancestry, color, disability or handicap, national origin, race, religion, gender, sexual or affectional orientation, gender identity, appearance, matriculation, political affiliation, marital status, veteran status, or any other classification protected by law.

The harassment of any person is unacceptable. Any person who believes that they or others have been subject to unlawful discrimination or harassment should report the incident and circumstances to their supervisor, a human resources manager, the compliance officer, or other senior manager. The incident will be investigated appropriately and impartially.

SCCE & HCCA strictly prohibits retaliation in any form against applicants or employees who in good faith make complaints or raise issues concerning discrimination, harassment, or any other violation of the law or this Code. Anyone who engages in retaliation will be disciplined up to and including termination.

## **Expectations**

Each person covered by this Code is important to the success of SCCE & HCCA. We expect these individuals to:

1. Treat coworkers and each other with respect and dignity.
2. Work safely.
3. Follow SCCE & HCCA policies and procedures.
4. Follow this Code.
5. Abstain from abusive language and/or reckless behavior.

## **Safe Workplace**

SCCE & HCCA is committed to providing a safe working environment free of intimidation, threatening speech or behavior, threats of harm, or violence, whether engaged in by another employee or a third party, such as vendors or volunteers.

## **Substance Abuse**

SCCE & HCCA will not accept the risk in the workplace that substance use or abuse may create. SCCE & HCCA expects employees covered by this Code to be in a suitable mental and physical condition while at work to perform their job effectively and safely. Both on-the-job and off-the-job involvement with mood-altering substances can have an adverse effect on our workplace and on SCCE & HCCA's ability to achieve its objectives of safety and security. Therefore, you may not be under the influence of mood-altering substances, or be in possession of illegal drugs, while on SCCE & HCCA property or when representing SCCE & HCCA.

## **Preventing Bribery and Corruption**

SCCE & HCCA expects everyone covered by this Code to work honestly and with integrity. Individuals should not offer bribes, accept bribes, or let others bribe employees. Individuals are expected to take the necessary steps to prevent bribery by others who conduct business on our behalf.

Individuals covered by this Code are not to receive or give monetary or non-monetary gifts, favors, entertainment, payments, or anything of value from, to, or for the benefit of any party. This includes competitors, members, non-members, suppliers, or other persons seeking to do business or doing business with SCCE & HCCA.

## **Reporting Responsibility**

Each individual covered in this Code is a valued member of the team, and each has a duty to see that SCCE & HCCA maintains its high standards of professional and ethical conduct. It is everyone's responsibility to comply with all policies, applicable laws, and regulations. Violations or suspected violations should be reported in accordance with the guidelines set forth in the SCCE & HCCA Employee Handbook.

Employees are encouraged to ask questions if they are unsure about how to proceed or whether conduct violates the law or SCCE & HCCA policies.

## **Responsible Social Networking**

Employees should be aware that online activity is not always private. Professional contacts may be able to access personal information on sites such as Facebook, LinkedIn, and Twitter. Employee activity on these sites, even outside of the workplace, is governed by the SCCE & HCCA Social Networking Policy.

## **Confidentiality**

Protecting member and non-member information is critical to the success of SCCE & HCCA. Business information should not be discussed with anyone not employed by SCCE & HCCA, except as may be required in the normal course of business.

## **Political Activity**

SCCE & HCCA individuals covered by this Code are prohibited from making a direct or indirect contribution from SCCE & HCCA's corporate fund to or on behalf of a political party, committee, candidate, or official.

Employees are not permitted to participate in any political activity that interferes with or disrupts the workplace in any manner.

Employees who decide to run for public office or become active in personally supporting candidates for public office are expected to keep politics separate from employment. Employees should not allow political involvement to interfere with work performance. Employees who are seeking public office or are active in personally supporting candidates for public office are strictly prohibited from using the SCCE & HCCA name in association with any political or campaign activity without SCCE & HCCA's written permission.

Individuals covered in this Code are expected to refrain from political conversations during the work day or when representing SCCE & HCCA at a function.

## **Solicitation and Distribution**

SCCE & HCCA recognizes that employees may have interests in events and organizations outside the workplace. However, to assure a productive and harmonious work environment, employees are not permitted to sell merchandise or distribute literature during business hours. Non-employees are prohibited from selling merchandise or distributing literature of any kind on SCCE & HCCA property.

No solicitation of any kind is permitted during business hours. An employee may solicit on non-work-related matters only if both employees are on non-working time. Non-employees are prohibited from soliciting of any kind on SCCE & HCCA property.

## **Compliance Program**

Ethics, integrity, and compliance have always been valued principles at SCCE & HCCA. Our compliance program has been established to formally educate employees about the laws, regulations, policies, and procedures governing our activities. Our compliance program encourages the identification, communication, and correction of compliance issues to ensure that all our activities are ethical and legally compliant.

## **Conflicts of Interest**

SCCE & HCCA expects all individuals covered in this Code to avoid conflicts of interest or situations that may create the appearance of a conflict of interest. A conflict of interest is a divided loyalty between SCCE & HCCA's interests and an individual's personal interest, including interests of individuals and organizations related to the employee or board member.

Employees must follow the Conflict of Interest Policy set forth in the Employee Handbook. Board members must follow the SCCE & HCCA Board Member Conflict of Interest Policy and complete a Conflicts of Interest Disclosure Statement on an annual basis.

## **Oversight**

SCCE & HCCA will maintain a compliance officer who is responsible for oversight of the compliance program.

## **Who to Contact**

SCCE & HCCA has an open-door policy and suggests employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is the best person to address an area of concern. However, if an employee is not comfortable speaking with his/her supervisor or is not satisfied with the supervisor's response, the employee can speak with the human resources manager, the compliance officer, or the CEO. All individuals covered in this Code are required to report suspected violations of local, state, or federal law; our compliance program; or our policies to the CEO, compliance officer, or chair of the audit committee.

## **Society of Corporate Compliance and Ethics & Health Care Compliance Association**

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