

Policy: Organizational Ethics Statement

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Applicable to:	CHOP Enterprise-wide
Process owner:	Van Mahlab, Senior Director, Compliance Operations
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1 Policy Statement

The Children's Hospital of Philadelphia maintains this Organizational Ethics Statement in recognition of our responsibility to our patients, staff, physicians, and the community. This Organizational Ethics Statement affirms our commitment to legal, ethical, and professional behavior in all of our activities on behalf of CHOP.

2 Scope

This policy applies to the Trustees and Officers, employees, and Medical and Research Staffs of The Children's Hospital of Philadelphia, The Children's Hospital of Philadelphia Foundation, Children's Hospital of Philadelphia Practice Association; CHOP Clinical Associates; and the CHOPPA Practice Plans (currently Children's Anesthesiology Associates, Children's Health Care Associates, Children's Surgical Associates, and Radiology Associates of Children's Hospital, and their New Jersey entities (collectively, the "Hospital" or "CHOP"). It also applies to any other persons or entities acting or providing services on behalf of the Hospital.

3 Guidelines

All persons covered by this policy are responsible for following the attached Organizational Ethics Statement.

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CHILDREN'S HOSPITAL OF PHILADELPHIA ORGANIZATIONAL ETHICS STATEMENT

The Hospital has adopted this Organizational Ethics Statement in recognition of our responsibility to our patients, staff, physicians, and the community. This Organizational Ethics Statement affirms our commitment to legal, ethical, and professional behavior in all of our activities on behalf of the Hospital.

“We” or “our” in this Statement means the Trustees and Officers, employees, and Medical and Research Staffs of The Children's Hospital of Philadelphia, The Children's Hospital of Philadelphia Foundation, Children's Hospital of Philadelphia Practice Association; CHOP Clinical Associates; and the CHOPPA Practice Plans (currently Children's Anesthesiology Associates, Children's Health Care Associates, Children's Surgical Associates, and Radiology Associates of Children's Hospital (collectively, the “Hospital” or “CHOP”). providing services or conducting research at facilities owned or operated by the Hospital.

1. Ethics and Personal and Professional Integrity

We are committed to adhering to the highest ethical standards in all of our activities for the Hospital. We strive to carry out our responsibilities with honesty, integrity, and openness. The Hospital strives to promote a working environment that values respect, fairness, and ethical conduct.

2. Commitment to Hospital Mission, Values and Reputation

We are dedicated to working to support CHOP's mission: Children's Hospital of Philadelphia, the oldest hospital in the United States dedicated exclusively to pediatrics, strives to be the world leader in the advancement of health care for children by integrating excellent patient care, innovative research, and quality professional education into all of its programs.

We perform our work in accordance with the values of the Hospital, which include Integrity, Compassion, Accountability, Respect and Excellence.

The reputation of the Hospital is among our most valued asset and we strive to assure that we act at all times in a manner that will reflect positively on the long-term reputation of the Hospital.

3. Leadership Responsibilities

We recognize that persons in leadership roles (including all persons in the organization with direct reports, from front line managers to the most senior executives) have particular obligations to set the tone for organizational conduct and to use their influence to establish and enforce expectations of appropriate ethical and business behavior. Leaders must act in accordance with the highest standards of conduct and avoid any behavior or statements, in the course of their work and in interactions with internal colleagues and external parties, that might damage the organization or cause harm to the Hospital's reputation.

4. Governance

CHOP is governed by Boards of Trustees that are responsible for setting the mission and strategic direction of the organization and for oversight of the finances, operations, and policies of the Hospital, as set forth in CHOP's respective Bylaws.

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5. Respect for Patients and their Families

We treat patients and their families with dignity, respect, and courtesy. Patients and parents/patient representatives are involved in decisions regarding the care that we deliver to the extent that it is appropriate. We also seek to inform patients and parents/patient representatives about the therapeutic alternatives and the risks associated with care they are seeking. We seek to understand and respect patients' and families' objectives for care and to provide services that meet the identified needs of patients and families. We strive to adhere to a uniform standard of care throughout the Hospital and its affiliates, consistent with patient needs. We attempt to treat patients and families in a manner that is respectful of and sensitive to their backgrounds, cultures, religions, and heritages.

6. Availability of Patient Care

We provide services to those patients for whom we can safely and appropriately provide care, regardless of race, color, age, sex, gender identity or expression, sexual orientation, national origin, religion, and disability. We provide financial assistance to patients/families in accordance with the Hospital's Financial Assistance Policy. We fairly and accurately represent the capabilities of the Hospital and the services we can provide to patients.

7. Fair Billing Practices

We strive at all times to assure that billings to patients and parents/patient representatives and government and private payors are accurate, timely, and understandable and meet applicable legal and contractual requirements. We assist patients and parents/patient representatives who seek to understand the cost of their care. We also attempt to resolve questions and objections to the satisfaction of patients and parents/patient representatives while also considering the best interests of the Hospital.

8. Resolution of Conflicts

We recognize that, from time to time, conflicts will arise among those who participate in patient-care and other decisions. We will seek to resolve conflicts fairly and objectively through a number of established mechanisms, including Administrative and Human Resources policies and the Hospital's Ethics Committee.

9. Recognition of Potential Conflicts of Interest

We recognize that the potential for conflicts of interest exists for the institution and decision-makers at all levels within the Hospital and its affiliates, including Trustees, administration, the Medical and Research Staffs and other employees. We follow the Hospital's Conflicts of Interest Policy and Interactions with Vendors Policy, which require that potential, perceived, and actual conflicts are to be avoided. We disclose potential conflicts of interest in accordance with the policies, so that appropriate action may be taken to ensure that important decisions are not inappropriately influenced by conflicts.

10. Confidentiality

We maintain patient and other institutional information in a confidential matter in accordance with law and the Hospital's Confidentiality of Patient and Institutional Information Policy and related policies. We use patient and institutional information only to the extent we are authorized to do so to carry out our duties on behalf of the Hospital. We take care to protect patient and institutional information from unauthorized access, use, or disclosure.

11. Compliance with Laws and Policies

We recognize the importance of being knowledgeable of and complying with all applicable laws and the policies of

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the Hospital. The Hospital maintains a Compliance Program that seeks to assure that the activities of the Hospital and our personnel comply with relevant legal, regulatory, ethical, and institutional standards.

12. Reporting Violations and Protection from Retaliation

We recognize and comply with our obligation to report any suspected illegal or improper conduct or violations of hospital policies through the appropriate channels, as described in the Hospital's Compliance Standards of Conduct. Our Compliance Program includes systems to allow prompt reporting of any compliance concerns or issues, including the availability of a hotline for making anonymous reports. We do not retaliate against anyone for making a good faith report of a compliance issue.

13. Openness and Disclosure

We make legally required and appropriate disclosures to government bodies that regulate the Hospital, to the auditors of the Hospital, and to others in connection with their duties on behalf of the Hospital. In all such disclosures and in other situations where we provide information, we seek to provide information that is full, fair, accurate, timely, and understandable.

14. Organizational Improvement

We strive, on a continuing basis, to enhance safety, improve patient care, and increase organizational effectiveness.

15. Safeguarding Institutional Resources

We seek to ensure effective and appropriate use of funds and other resources of the Hospital, including adhering to the following principles:

- Providing appropriate resources for programs in support of the mission of The Children's Hospital of Philadelphia;
- Providing appropriate resources to ensure effective accounting systems, internal controls, competent staff, and other systems critical to the management of the Hospital;
- Compensating staff reasonably and appropriately; and
- Safeguarding against the waste, misuse, or other inappropriate use of resources of the Hospital.

16. Fundraising

We disclose important and relevant information to potential donors and are truthful in our solicitation materials. We respect the privacy concerns of individual donors to the extent permitted by law. We expend funds consistent with donor intent and the mission of The Children's Hospital of Philadelphia. Our fundraising costs are reasonable. Our fundraising activities are ethical and appropriate.

17. Inclusiveness and Diversity

We promote inclusiveness and diversity in our Boards, Medical and Research Staffs, employees, and volunteers. We take meaningful steps to promote inclusiveness and diversity in our hiring, retention, promotion, Board recruitment, and constituencies served.

18. Accountability

We hold ourselves accountable to act in accordance with this Organizational Ethics Statement and the supporting policies. We take appropriate disciplinary action against those who fail to do so.