



 **DANA-FARBER**
CANCER INSTITUTE



INTRODUCTION

Since its founding in 1947 by Dr. Sidney Farber, Dana-Farber Cancer Institute has been guided by Dr. Farber's vision: to provide expert, compassionate care to children and adults with cancer while advancing the understanding, diagnosis, treatment, cure, and prevention of cancer and related diseases. As an affiliate of the Harvard Medical School and the founding member of Dana-Farber/Harvard Cancer Care, the largest comprehensive cancer center designated by the National Cancer Institute, Dana-Farber also provides training for new generations of physicians and scientists, designs programs that promote public health, particularly among high-risk and underserved populations, and disseminates innovative patient therapies and scientific discoveries across the United States and throughout the world.

Dana-Farber has adopted these Core Values to guide its efforts in achieving its institutional vision:

- **Impact.** Above all else, we make a difference by relieving the burden of disease now and for the future through our research, clinical care, education, outreach, and advocacy.
- **Excellence.** We pursue excellence relentlessly and with integrity in all that we do, adhering always to the highest standards of conduct.
- **Compassion and Respect.** We demand compassion and respect for those in our care and for one another.
- **Discovery.** We foster the spirit of inquiry, promoting collaboration and innovation across traditional boundaries, while celebrating individual creativity.

All Individuals¹ associated with Dana-Farber² are expected to perform their duties honestly, responsibly, and in conformance with the highest professional and business ethics. Truly ethical business practices are the product of more than fear of legal ramifications or appreciation of the competitive value of a good reputation. Ethical business practices entail a clear understanding of right and wrong, and a motivation to act at all times in a manner of which Dana-Farber can be proud. This standard requires adherence to not only the letter, but also to the spirit of all applicable laws, regulations, and institutional policies.

COMPLIANCE PROGRAM

¹ "Individual" means, as applicable, any employee, faculty member, medical staff member, trustee, director, officer, trainee, volunteer, or consultant of Dana-Farber.

² The Code applies to Dana-Farber Cancer Institute, Inc., Dana-Farber, Inc., The Dana-Farber Trust, Inc. and any subsidiaries, foundations, or departments of any of these entities. All such entities are referred to collectively as "Dana-Farber" or "the Institute."

Overview. Dana-Farber Cancer Institute is committed to maintaining excellence and integrity in all aspects of its operations and to compliance with all applicable laws, regulations and industry standards. Dana-Farber's Compliance Program is intended to promote a culture of compliance and open communication, to be a resource to staff, to prevent and detect activities contrary to the organization's standards, policies and mission and to ensure adherence to laws and regulations.

Scope. The Compliance Program applies to all professional and business activities of the entire Dana-Farber Cancer Institute workforce including trustees, officers, executives, professional staff, employees, agents and contractors. Dana-Farber's Compliance Program includes the following elements:

1. Code of Conduct and Written Standards
2. Designation of a Compliance Officer and Compliance Committee
3. Effective Training and Education
4. Developing Effective Lines of Communication
5. Enforcing Standards through Disciplinary Guidelines
6. Auditing and Monitoring
7. Investigation and Corrective Action

CODE OF CONDUCT

This Code of Conduct identifies principles of behavior or summarizes existing policy that is underscored by Dana-Farber's Core Values. The Code is not intended to restate all the institutional policies and procedures that govern ethical behavior. Rather, the Code provides guidelines for all Individuals to follow at work. Specific policies and procedures, many of which are identified at the end of this document, should be consulted as necessary. Regardless of whether a certain situation is described in this Code, all individuals are expected to adhere to the highest standards of ethical behavior that is the hallmark of Dana-Farber.

Violations of law or policy should be reported to a supervisor, the Department of Human Resources, the Office of General Counsel, or the Chief Compliance Officer. A violation of this Code of Conduct may result in disciplinary action, including termination of the individual's association with the Institute.

PATIENT CARE

Dana-Farber is dedicated to delivering the highest quality care and the safest products and services to its patients and their families in an atmosphere that fosters compassion and respect. Effective healthcare requires collaboration between and among patients, their families, clinical staff, and support staff. Open and honest communication, respect for personal and professional values, and sensitivity to differences are integral to optimal patient care. Patients will be treated with dignity and respect at all times. Only those authorized to provide medical care and advice may do so. Further, only those directly responsible for a patient's medical care and treatment may offer remedies, diagnoses, prognoses, or other information that could be interpreted as providing care. The healthcare team will make clinical

recommendations based upon identified patient health care needs, without regard to compensation or financial arrangements.

Dana-Farber is committed to compliance with all applicable clinical laws and standards, including state and federal regulations, Medicare and Medicaid rules and regulations and those of The Joint Commission. Dana-Farber provides each patient with information regarding his or her rights and responsibilities, and will strive to protect those rights throughout the patient's care and treatment.

Dana-Farber's "Patient Rights and Responsibilities" provides that each patient has the right to:

- receive health care that respects cultural, psychosocial, and personal values and beliefs, including the right to request pastoral and other spiritual services. The Institute is committed to serving all patients, without regard to race, color, religion, national origin, sex, age, marital status, sexual orientation, gender identity or expression, disability, political affiliation, veteran status, or other non-medically relevant factors;
- obtain a copy of any rules or regulations that relate to the conduct of patients, as provided below;
- have a family member, friend, or other individual be present for support during visits;
- know that your/your child's records and communications are confidential to the extent provided by law;
- expect privacy during medical treatment and care, within the capacity of the Institute;
- refuse to be examined, observed, or treated by students or other Institute staff, without jeopardizing access to psychiatric, psychological, or other medical care;
- refuse to serve as a research subject or receive any care or examination that is primarily for educational or informational purposes, rather than for treatment; and participate in any consideration of ethical issues that arise in your care or your child's, such as resolving conflict, withholding resuscitation, forgoing or withdrawing life-sustaining treatment, or taking part in research studies;
- receive assessment and treatment for physical and psychological pain;
- obtain an explanation of any relationship (including financial) that the Institute or your/your child's physician has with any other health care facility or educational institution, to the extent that the relationship relates to your care or your child's;
- receive information regarding financial assistance or free health care;
- receive information, as needed and available, if you have a vision, speech, hearing, or cognitive impairment;
- obtain the name and specialty of the physician or other health care providers caring for you or your child;

- have all reasonable requests responded to promptly and adequately, within the capacity of the Institute;
- receive enough information to give an informed consent to treatment, to the extent provided by law, including an explanation of your condition or your child's, proposed treatments, and alternative therapies, with their respective benefits and risks;
- make decisions regarding your/your child's health care, including the decision to refuse or discontinue treatment, to the extent permitted by law;
- fill out advance care directives, such as a health care proxy form, to designate someone who can make decisions for you if you become incapable of understanding a proposed treatment or procedure, or are unable to communicate your wishes regarding care;
- receive a complete copy of the Massachusetts Patient Rights law (M.G.L., ch. 111, section 70E), available from Patient/Family Relations, or online at www.mass.gov/legis/laws/mgl/111-70e.htm;
- if you have breast cancer, receive complete information from your physician on medically viable alternative treatments;
- have an interpreter or other assistance, as needed and available, when there is a language, communication, or hearing barrier;
- inspect your medical record, or your child's, and receive a copy of it. If a copy is requested, a fee may be charged, unless the request supports a claim or appeal under any provision of the Social Security Act in any federal or state needs-based benefit program;
- receive prompt, life-saving treatment in an emergency, without discrimination or delay based on economic or payment concerns;
- receive a prompt and safe transfer to the care of others if the Institute is unable to meet your request or need for treatment or service. For example, if we are unable to offer the type and quality of care, based on available resources, required by your specific condition or disease, or those of your child, we will make sure that you can receive care elsewhere;
- receive an itemized list of charges submitted by the Institute to your insurer or another third party regarding your care or your child's, including the amounts covered by the third-party payer, and a copy of the Institute's itemized charges sent to the attending physician;
- register complaints or grievances, and seek solutions to problems, through Patient/Family Relations. You have the right to file a grievance with the Institute if you have concerns regarding your care and treatment.

RESEARCH

A significant component of Dana-Farber's mission is to conduct basic and clinical research regarding the causes, prevention, and treatment of cancer, to translate the products of its research for the benefit of patients and to facilitate the transfer of biomedical technology for disease treatment. Dana-Farber is committed to scientific excellence and integrity, both in the research itself and in managing the intellectual property arising from such research. All Dana-Farber faculty members and others who participate in the conduct of research will conduct research in accordance with the Harvard Medical School Faculty Policies on Integrity in Science. Dana-Farber adheres to applicable rules and regulations mandated by the National Institutes of Health and the Food and Drug Administration, among others. Further, in association with its commitment to joint scientific and clinical research, Dana-Farber works with the other members of the Dana-Farber/Harvard Cancer Center to comply with applicable federal regulations, including those governing Institutional Review Boards and other aspects of research integrity and oversight.

ETHICAL BUSINESS BEHAVIOR

As noted above, Dana-Farber is committed to conducting its operations in accordance with the highest ethical and legal standards. Individuals are expected to treat patients, each other, customers, and vendors with respect and dignity.

Specific policies that address these standards of behavior include:

Discrimination/Harassment. Dana-Farber prohibits discrimination and sexual or other harassment or abusive behavior. Instances of such discrimination or harassment should be reported to a supervisor, Human Resources, the Office of General Counsel, and/or the Chief Compliance Officer. Each Individual is responsible for becoming familiar with the Institute's sexual harassment and discrimination policies.

Workplace Violence. Dana-Farber prohibits threatening or abusive behavior in the workplace. Instances of such behavior should be reported under the Workplace Violence Policy.

Professional Behavior. Dana-Farber desires an environment free from disruptive, threatening, or violent behavior, and does not tolerate inappropriate, unprofessional or intimidating behavior within the workplace. All Individuals, including patients, visitors, staff and faculty, are treated with courtesy, respect and dignity. Staff members are expected to be accountable for their behavior and avoid retaliation against those who report concerns. Each Individual is responsible for becoming familiar with the Institute's policy on Professional Behavior.

Drug-Free Workplace. As a drug-free workplace, Dana-Farber prohibits the unauthorized manufacture, possession, use, sale, or distribution of drugs in the workplace, or working while under the influence of alcohol or drugs.

Travel Arrangements. Dana-Farber requires that travel and meeting expenses be authorized and documented in accordance with its Travel Authorization and Reimbursement Policy. The policy,

developed in accordance with state and federal laws, applies to all travel funded by restricted gifts and grants as well as general operating funds.

Competitive Bidding. Dana-Farber's Purchasing Department is responsible for obtaining maximum value in procuring materials, equipment, and services. The Purchasing Department maintains policies and procedures for the purchase of capital equipment. The Facilities Department maintains policies regarding the award of construction contracts. The Pharmacy Department maintains policies regarding the purchase of pharmaceuticals.

Accurate Records. All patient and business records should be accurate and complete. They shall not contain false or misleading information. Medical records and financial transactions are recorded and maintained in accordance with the law and generally accepted business practices. Medical records can be amended to correct an error or complete documentation only in accordance with established medical records procedures.

Gifts. Business decisions should be made on the basis of quality, service, price, and similar competitive factors. Individuals should avoid even the appearance that decisions were influenced by business courtesies. In the course of carrying out their responsibilities to Dana-Farber, Individuals may be offered gifts, tips, or money by patients, visitors, or vendors. Individuals should not give, seek, or accept from patients or visitors, in connection with Dana-Farber's business: 1) any type of compensation or commission; 2) any monetary gifts, financial assets, or gratuities, regardless of the amount; or 3) any other gift or gratuity of more than nominal value, including meals, entertainment, living accommodations, trips, or personal favors and preferences. Individuals may not accept any gifts, benefits or items of value from vendors. All Individuals will adhere to the Medicare and Medicaid antifraud and abuse laws and any other statutes or regulations regarding remuneration for the referral of patients. Individuals should suggest to those proposing gifts not meeting the above guidelines that they contribute the value of the proposed gift to the Dana-Farber Cancer Institute or the Jimmy Fund. If an Individual is offered or receives a gift that he or she suspects does not comply with this policy, the Individual should report that to a supervisor and/or to the Chief Compliance Officer.

No gift, gratuity, entertainment, or other favors shall be offered or given to a government employee. Circumstances may require a modest luncheon on Dana-Farber premises during the continuation of a business meeting; in those instances, Dana-Farber may pay for the luncheon of government visitors, but they should be permitted, if they desire, to reimburse Dana-Farber for the reasonable value of their food.

Antitrust Laws. Federal and state antitrust laws prohibit agreements between competitors to fix prices or to allocate customers or markets. Both the United States and Massachusetts law forbid unfair or deceptive business or trade practices. Individuals should take great care to avoid violations of these laws and should consult their supervisors or the Office of the General Counsel with questions.

Insider Trading. Securities laws make it illegal to buy or sell securities, such as Dana-Farber bonds, whether for oneself or for others, while in improper possession of material, nonpublic information. It is also inappropriate to transmit such information to others. Care should also be taken not to use, or to transmit to others, material nonpublic information about companies sponsoring research at Dana-Farber or nonpublic results of research studies conducted at Dana-Farber or any other site. Any questions as to the use of nonpublic information should be directed to Dana-Farber's Chief Financial Officer or General Counsel for prior approval.

Government Officials and Regulatory Agencies. Special care should be taken in responding to requests for information from government agencies. Under the direction of the Office of General Counsel, Dana-Farber complies with all appropriate requests for information from government agencies, auditors, or other officials. Any requests for information, such as a subpoena, or a search warrant, should be brought to the attention of the Office of General Counsel. Any employee who is contacted by a government official in connection with an investigation or a request for documents should document the agency, the agent's name and title, the subject matter of the request or discussion, and any other pertinent information, and immediately notify the appropriate department head and the Office of General Counsel. Dana-Farber policies on responding to legal processes, including requests for patient records via subpoena, should be consulted as needed before any response is made.

Political Activity. Dana-Farber's nonprofit, tax-exempt status makes certain political activity inappropriate. Dana-Farber may not actively support or contribute funds to political parties or candidates. Political signs or literature may not be displayed or distributed on Dana-Farber premises. Dana-Farber may appropriately, however, advocate a position on legislation or regulation affecting the healthcare industry, academic medicine, biomedical research industry, or other matters of interest to Dana-Farber. These limitations are not intended to discourage or prevent Individuals from engaging in political activities on their own time and at their own expense. All Individuals are encouraged to express their personal views on government, legislation and other matters of national and local interest.

CONFIDENTIALITY

Individuals must treat all information obtained through their association with Dana-Farber with the utmost care. Patient information is confidential as a matter of law, and may be shared only with authorized persons and only as appropriate for optimum patient care and as provided in institutional policies regarding quality assurance, risk management, human studies, and research. Individuals must adhere to all laws and regulations related to the confidential status of patient care, clinical and research records, and communications, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The identity, diagnosis, or condition of a patient may not be discussed publicly without the patient's written authorization. Breaches of confidentiality may result in personal liability and disciplinary action.

Requests by the news media for information or comment regarding a patient or a matter of public interest should be referred to the Communications Department. In addition, the Communications

Department can provide the media information about Dana-Farber and process requests for interviews with Individuals. Individuals should contact Communications if they:

- are contacted to comment on an individual patient's care, an individual's work, or any other Dana-Farber related matter;
- anticipate public interest in a paper or lecture; or
- know that a patient or an individual was contacted by, or is contacting, the media.

All software and information on Dana-Farber computers is the property of Dana-Farber, and Dana-Farber reserves the right to enter and monitor all computer files, including electronic mail, for business purposes in its discretion, such as investigating theft, misuse or disclosure of information, and personal use or abuse of computers or software. Subject to Dana-Farber's rights, information stored on a computer is the confidential information of the person who authorized its storage, whether it has been protected or not, and whether it has been accessed intentionally or inadvertently. Examination or use of such information without authorization is a violation of that person's privacy rights and of this Code.

Other confidential matters warrant appropriate care to ensure their protection. These include: business information about Dana-Farber learned through one's employment; proprietary information about any organization with which Dana-Farber does business or that sponsors research at Dana-Farber; and information about an individual's employment and compensation, except pursuant to established Human Resources policies.

CONFLICTS OF INTEREST

Individuals should avoid any activity that may constitute, or have the appearance of constituting, a conflict of interest with the mission or the interests of Dana-Farber. A conflict of interest occurs when a relationship or activity impairs, or gives the appearance of impairing, an Individual's ability to make fair and objective decisions when conducting the business of Dana-Farber. Individuals shall devote their loyalty, time, and effort to Dana-Farber activities in accordance with their agreed-upon time commitments. Because individuals may have diverse financial and professional interests, it may require considerable care to avoid a conflict of personal interests with those of Dana-Farber. In addition, Dana-Farber personnel, assets, equipment, and corporate opportunities may be used only for the advancement of Dana-Farber's charitable activities; use for personal gain is prohibited.

Examples of conflicts of interest are listed below.

- Individuals may not direct their energies to another organization if to do so would compromise their commitment to Dana-Farber.
- Individuals may not use their position at Dana-Farber to direct Dana-Farber business in any way that would benefit the individual or his or her family.
- Individuals may not work or consult for a competitor or potential competitor without Dana-Farber approval.

- Individuals who care for patients may not enter into any business arrangements with those patients or direct patients to businesses in which they or their families have a financial interest.
- Other than compensation received from Dana-Farber, Individuals may not request or accept anything that violates Dana-Farber's gift policy.
- Hiring family members of employees is prohibited if to do so would put one family member in a supervisory or management relationship to another.

Managers shall disclose annually actual or potential conflicts, including any relationship with another organization by which they are paid as an officer, director, consultant or similar position; any relationship to an organization doing business with, or competing with, Dana-Farber, in which they or a family member have a financial interest, including an equity interest; and any relationship in which their employment would conflict with their employment at Dana-Farber as to time, expense, or mission. Managers should update this information during the year if it changes in any material way. Measures may be adopted to eliminate or ameliorate such conflicts.

Faculty members and staff who participate in research are expected to evaluate their professional relationships and activities on an ongoing basis to determine whether they result in actual or perceived conflicts of interest. Potential conflicts involving Dana-Farber faculty and their research activities should be disclosed according to the Harvard University Faculty of Medicine Policy on Conflicts of Interest and the Dana-Farber Research Policies and Procedures. Because relationships between Dana-Farber faculty members and biomedical businesses may accelerate scientific discovery and the translation of inventions to clinical and scientific use, some conflicts of interest or commitment may be acceptable in that context, as long as they are properly disclosed and managed, if necessary.

WORKPLACE SAFETY AND ENVIRONMENTAL PROTECTION

Because Dana-Farber values the safety and health of its employees and patients, compliance with all occupational health and safety regulations and recognized industry standards is critical. It is Dana-Farber's policy to comply fully, and to have Individuals perform their duties in accordance with, all applicable statutes, ordinances, regulations, orders, and permits relating to public health, safety, and the environment.

Dana-Farber protects the environment by promoting cost-effective business practices and strives to meet or exceed all environmental laws and regulations, minimize waste, ensure proper disposal of contaminated waste, promote recycling of materials, eliminate emissions of toxic or dangerous substances into air, water or earth, encourage the use of alternative transportation, purchase products that contain recycled materials, are recyclable or reusable, and cause the least environmental harm during manufacturing, use, and disposal.

PRINCIPLES OF FINANCIAL MANAGEMENT

Dana-Farber's relationship with vendors and third-party payors, including federal and state government, and private insurance companies and managed care organizations, are subject to

numerous laws and regulations. Individuals who are involved in managing Dana-Farber's assets, and in paying, billing, or contracting for services, have a special responsibility to:

- oversee properly Dana-Farber real and personal property;
- understand and adhere to all applicable regulations and procurement rules with regard to all aspects of payment for products or services;
- ensure that accounting standards and principles are properly and consistently followed, including, but not limited to, generally accepted accounting principles and federal accounting requirements;
- ensure that billings accurately reflect goods and services provided;
- ensure that information authorized to be available for public disclosure and upon public request is readily available, and that, other than as released in official Dana-Farber financial statements, financial information is not released without the prior approval of the Chief Financial Officer;
- engage independent auditors and appropriate consultant expertise as necessary and required to prepare tax filings and annual financial statements; and
- ensure that appropriate and reasonable mechanisms are in place to facilitate bad debt and collection efforts.

Billing for Services. Dana-Farber bills only for care and services that have been properly authorized and documented as medically necessary. DFCI will take reasonable steps to ensure that billing and coding are accurate, timely, and in compliance with internal policies and procedures, and will investigate billing discrepancies. Services will not be misrepresented in order to circumvent coverage limitations or to increase payment from third party payors. Individuals employed in billing and coding areas are expected to understand and comply with all billing-related policies and procedures established by Medicare, Medicaid, and other payors to whom claims are submitted. Dana-Farber is committed to working with patients, their families, and third party payors to arrange for discounts as appropriate, and to create understandable patient billing statements. Patients may direct questions or concerns about their bills to the Patient Family Relations Specialist or directly to the Credit and Collections Manager for review and explanation. Sincere efforts shall be made to reach a mutually satisfactory resolution on any billing concerns.

Fundraising. In an effort to ensure compliance with all laws and regulations, Dana-Farber has adopted special measures beyond those required by law to monitor the conduct of fundraising events or promotions. Dana-Farber requires all volunteer-run events, where it permits the use of its name or the registered Jimmy Fund trademark, to provide evidence of prudent financial control and to comply fully with all relevant laws and regulations. Dana-Farber has established the Standard Tracking Events Procedure (STEP), a comprehensive process to ensure accountability to donors for collection and use of donated funds. For fundraising ventures conducted by businesses for the benefit of the Institute, Dana-Farber has established the Contract Regulatory Effectiveness (CoRE) program, to monitor the regulatory compliance and the appropriateness of proposed promotions or events by commercial organizations.

Dana-Farber registers as a charity in all states in which it raises funds on its own behalf, and insures that, if required, other persons or entities raising funds for Dana-Farber are registered and bonded to do so.

BOARD OF TRUSTEES

TRUSTEE RESPONSIBILITIES

The Dana-Farber Board of Trustees oversees the management of the Institution by its senior executives. Because the Trustees are especially entrusted with the welfare of the Institute, it is particularly important that they conduct themselves in accordance with this Code. Each Trustee is obligated to perform his or her duties in good faith, in a manner that the Trustee reasonably believes to be in the best interests of the Dana-Farber and with such care as an ordinarily prudent person would exercise under the circumstances. The Dana-Farber Trustee handbook comments that “with wisdom and thoughtful consideration, Trustees will oversee key policy and financial decisions, keeping the best interests of Dana-Farber paramount.”

In particular, Trustees are expected to:

- oversee the quality of patient care provided by the Institute;
- approve appointments to the institution’s medical staff;
- select the Chief Executive Officer, evaluate the performance of the Chief Executive Officer and approve the Chief Executive Officer’s compensation;
- review the annual audit and monitor the institution’s financial performance;
- approve annual operating and capital budgets;
- elect corporate officers; and
- receive reports from and oversee the work of board committees, to which certain board functions may be delegated.

Essential to a Trustee’s duty of care is the obligation of reasonable inquiry. Accordingly, a Trustee should attend meetings, read materials supplied prior to meetings, and take appropriate steps to become informed about the matters before the Board. Where appropriate, a Trustee may rely on the advice of outside advisors and on the reports of management.

TRUSTEES – CONFLICT OF INTEREST

Because of their fiduciary obligations to the organization, it is especially important that Trustees avoid conflicts of interest or the appearance of conflict between their personal interests and their duty to Dana-Farber. Conflicts may arise when a Trustee’s interests, or those of the Trustee’s family, are adverse to the interests of Dana-Farber, or when a Trustee has the ability to influence a decision of Dana-Farber so that it will, or might appear to, benefit the Trustee or a family member. In order to avoid a conflict of interest or an appearance of a conflict of interest:

1. A Trustee should not participate in a vote on a transaction in which the Trustee or a member of his or her family has a financial interest and should disclose any potential conflict before Dana-Farber acts on the transaction.
2. A Trustee, a member of his or her family, or an entity with which one or more of them has a material interest, may not do business with Dana-Farber unless expressly authorized by Dana-Farber after full disclosure.
3. A Trustee should fully disclose his or her association (including employment, consulting or membership on a governing board by the Trustee or a family member) with an entity that competes with or has interests conflicting with those of Dana-Farber and should refrain from participating in any vote of the other organization if the vote affects Dana-Farber.

Trustees shall disclose actual or potential conflicts each year pursuant to a process directed by the General Counsel. Trustees are expected to update their disclosures from time to time if the information disclosed annually changes in any material way. Disclosure statements are reviewed by the General Counsel, who discusses them as necessary with the Governance Committee and the Chairman of the Board of Trustees. The Board of Trustees of Dana-Farber has adopted a Statement of Principles, and the Dana-Farber Investment Committee has adopted a Conflict of Interest Policy to address specifically conflicts of interest that may arise for members of the Investment Committee.

REPORTING VIOLATIONS

If Individuals become aware of any violation of this Code of Conduct, they should report the violation to a supervisor, the Vice President of Human Resources, the Office of General Counsel, or the Chief Compliance Officer. Further, Individuals may report concerns regarding patient safety or quality directly to The Joint Commission. Any report made in good faith of a violation or a suspected violation will not lead to adverse action against the reporting Individual. Each report will be held in confidence to the extent permitted by law and sound business practice. An Individual may file an anonymous complaint about policies, systems, practices, and violations of law with any of the above offices. Reports related to accounting, financial reporting, internal controls, or auditing will be directed to the Audit and Compliance Committee of the Board of Trustees. While anonymous complaints may be submitted, the difficulty of verifying relevant information and the inherent unfairness of anonymous unsubstantiated allegations may make such complaints difficult to pursue.

Dana-Farber also has mechanisms in place to provide Individuals with ways to request consultations or to report violations without fear of discipline, retaliation, or termination. These mechanisms include:

- **The Compliance Office (617) 632-5492.** This office enables discussion directly with the Chief Compliance Officer.
- **Compliance Hotline and reporting website: (800) 451-0659 and www.compliancereport.org.** The hotline and website are available to anyone who wants to raise a concern about legal or ethical issues, or to report violations of law or ethics. The Compliance Hotline is staffed by an outside agency and is available 24 hours a day, 365 days a year.

- **Ethics Advisory Committee (617) 632-5713.** This multidisciplinary Committee addresses ethical concerns regarding patient care, research, and business matters. The Ethics Committee is a group of providers, patients, family members, and staff. This confidential Ethics Line is available 24 hours a day.

EDUCATION AND TRAINING

Under the direction of the Chief Financial Officer, the Chief Operating Officer, and the Chief Compliance Officer, Dana-Farber will establish, monitor, and continuously improve education and training procedures to ensure employee awareness and understanding of this Code of Ethics and Standards of Business Conduct. Managers are responsible for seeing that all employees have received training and compliance monitoring in their areas of responsibility and expertise.

REFERENCES

Dana-Farber Corporate Bylaws

Dana-Farber Medical Staff Bylaws

Dana-Farber Patient Care and Administrative Policy Manual

Dana-Farber Human Resources Policy Manual

Dana-Farber Community Benefit Plan

Dana-Farber Patient Bill of Rights

Dana-Farber Financial Assistance Policy

Dana-Farber Research Policy and Procedures Manual

Dana-Farber Safety Manual

Dana-Farber STEP Manual

Dana-Farber Contract Regulatory Evaluation (CoRE) Process Manual Dana-Farber Quality Improvement Plan

Harvard Medical School Procedures for Making Permanent, Term and Annual Appointments

Harvard Medical School Faculty Policies on Integrity in Science

Investment Committee Policy on Conflict of Interest

Statement of Principles on Conflict of Interest

Dana-Farber Travel Authorization and Reimbursement Policy

These and other relevant policies are available on the Dana-Farber intranet set under “Popular Links”, “Policies and Manuals”.

**DANA-FARBER CANCER INSTITUTE
CODE OF CONDUCT ACKNOWLEDGMENT**

I acknowledge and agree that:

1. I have received Dana-Farber Cancer Institute's ("DFCI") Code of Conduct (the "Code");
2. I understand that I am required to read and understand the Code;
3. I agree to comply with the Code in performing my DFCI-related duties as a condition of my employment or other relationship with DFCI, and if applicable, of my clinical privileges and academic appointments;
4. I understand that it is my responsibility to report to the appropriate person any violations of the Code that come to my attention; and
5. I understand that my failure to comply with the Code may result in disciplinary action, up to and including termination.

Acknowledged and agreed:

Signature

Date

Name

Job Title

Employee ID #



Dana-Farber Cancer Institute
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A Teaching Affiliate
of Harvard Medical School