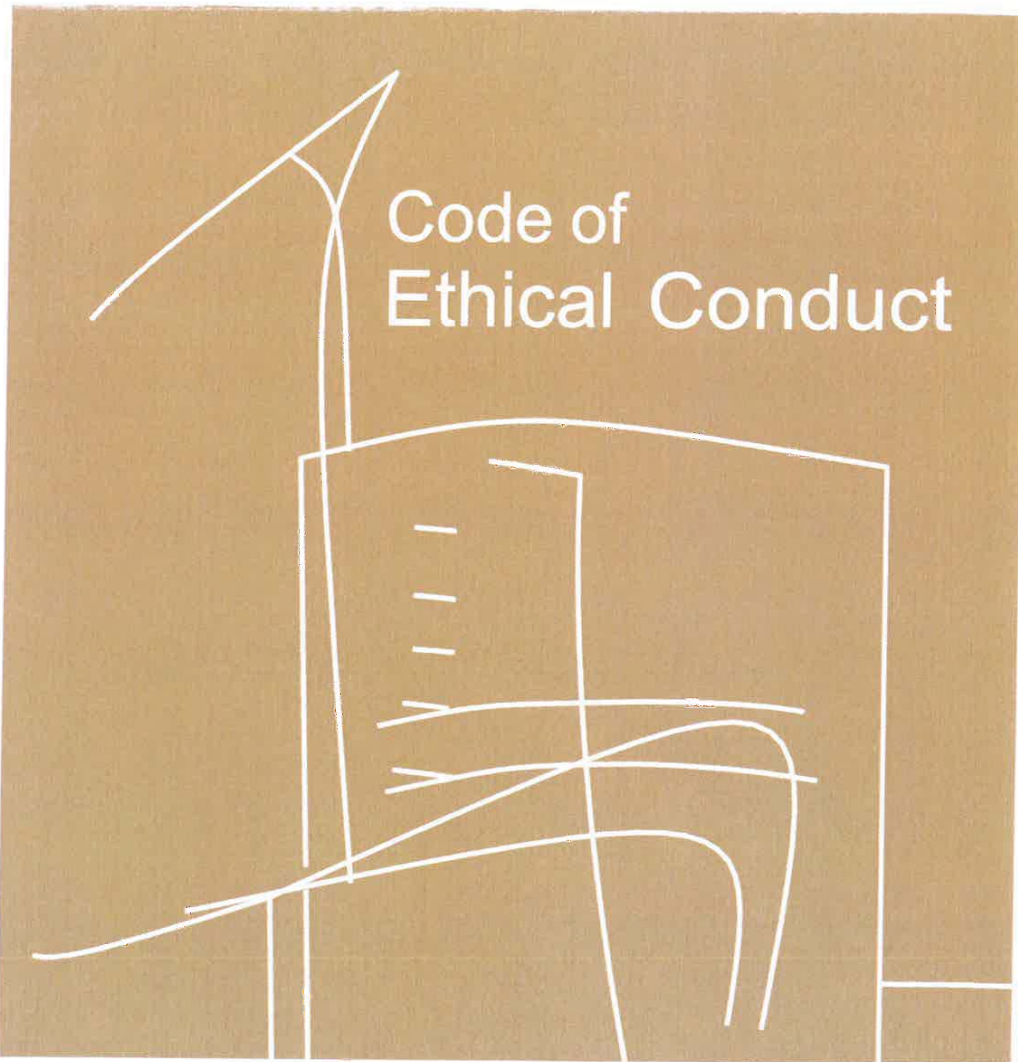
	Document Title	Document Number	Issue Date
	Code of Ethical Conduct	333	19/06/2016
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CODE OF ETHICAL CONDUCT	Executive Committee 15.9 (2015)	1	31/12/2019
<p>If you print this document from the Electronic Manual, the copy is valid only until midnight of the day you printed it.</p>			



Overview



Sidra Medical and Research Center is committed to providing optimal care and performance with integrity. When people behave with integrity, they act honestly, sincerely, ethically, and lawfully. Sidra created the Ethics and Compliance Division to reinforce this commitment and promote the highest standards of conduct in the workplace. The Sidra Code of Ethical Conduct is the foundation of Sidra's Ethics and Compliance initiatives and serves as a formal statement of Sidra's standards and principles of ethical business conduct.

Our Code of Ethical Conduct provides guidance to all Sidra staff and assists us in carrying out our daily activities within the appropriate ethical and legal standards. These standards apply to our relationships with patients, affiliated medical professionals, vendors, consultants, and one another. The Code of Ethical Conduct also serves as a way for Sidra to communicate its standards of ethical conduct to all who have relationships with Sidra.

While the Code of Ethical Conduct is a valuable resource, it is not meant to address every circumstance Sidra staff may encounter. Sidra has developed a comprehensive set of policies and procedures that may be accessed on the Sidra portal. These policies and procedures will be revised or supplemented as needed to promote Sidra's commitment to ethical behavior and best practice compliance standards.

Ethics and Compliance Program

Sidra is committed to maintaining an ethics and compliance program that promotes the prevention, detection and resolution of conduct that does not conform to applicable laws, regulations, Sidra policy or the Code of Ethical Conduct. The ethics and compliance program sets the tone for all work conducted at Sidra—we must all work together to preserve Sidra's reputation for integrity.

The goals of the Ethics and Compliance program are:

- ▶ To provide a formal statement of Sidra's standards and principles of ethical business conduct to all Sidra staff and business partners.
- ▶ To monitor and provide information about applicable laws, regulations, policies and procedures.
- ▶ To advise Sidra in taking appropriate action should a breach of ethical conduct occur.

Sidra has an Ethics and Compliance Division that is responsible for the oversight and management of Sidra's Ethics and Compliance program and is part of the Office of the General Counsel.

All Sidra staff are expected to understand and follow the principles described in the Code of Ethical Conduct.

- ▶ Compliance is everyone's responsibility.
- ▶ Sidra staff have a responsibility to, in good faith, report any known or suspected violation of Sidra policy or applicable law and regulation.
- ▶ Anyone who honestly and in good faith reports suspected wrongdoing will be protected from retaliation.
- ▶ All Sidra staff must participate in the annual training required by the ethics and compliance program.



Living by Our Values

Mission

Sidra will provide patients with world-class healthcare services in an innovative and ultramodern facility specially designed to promote healing. In particular, Sidra will address the growing need for more comprehensive, patient-focused medical services for women and children in Qatar and throughout the region.

In collaboration with the premier medical school in Education City, leading research institutions worldwide, and Qatar's health sector, Sidra will provide an environment conducive to training medical students and highly skilled clinicians, and will be a pioneer in basic, translational and clinical research of value to the population of Qatar and the world.

Vision

Sidra will be a beacon of learning, discovery and exceptional care, ranked among the top academic medical and research centers in the world.

Living by Our Values

Values

Our values embody what is important to us and describe how we will behave towards our patients, their families and each other.

Trust

- Being **competent**
- Acting **consistently, reliably** and **predictably**
- Acting with **honesty** and **integrity**
- **Respecting** patient, employee and commercial **confidentiality**
- Delivering on **commitments**

Care

- Acting with **empathy**
- Consistently acting with **kindness** and **compassion**
- **Being humble**
- **Listening** and **responding**
- Acting with **cultural sensitivity**

Teamwork

- **Sharing information and knowledge** and **learning from demonstrated expertise**
- Being **respectful**, and thereby earning respect of others
- Acting with **professionalism**
- **Leading** and **following**

Transparency

- Frequent and honest **communication**
- Open **access to information** for decision making
- Willingly **acknowledge shortcomings**
- **“Speaking up”** about concerns
- **Publishing** performance indicators

Innovation

- **Freedom** to innovate
- **Welcoming ideas** and encouraging **creativity**
- Supporting **talent**
- Creating **confidence**
- Celebrating **successes**

Efficiency

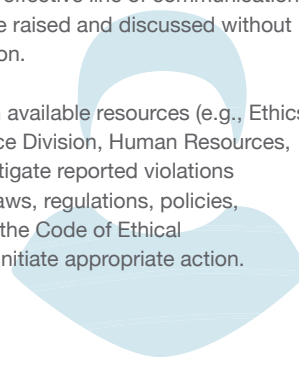
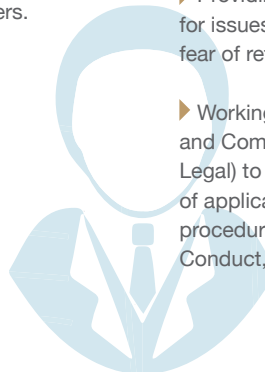
- Providing measurable **value**
- **Using data to drive decision making**
- Having and **achieving clear goals**
- Building **processes that work**
- **Continuously improving** outcomes in patient and family care

Code of Ethical Conduct Accountabilities

The Code of Ethical Conduct applies to all Sidra staff and all members of its Board of Governors and Board committees.

All Sidra staff are responsible for:

- ▶ Understanding and applying the principles of the Code of Ethical Conduct in daily work interactions and activities.
- ▶ Behaving in a way that is consistent with Sidra's Code of Ethical Conduct and the ethics and compliance program.
- ▶ Assuming ownership and accountability for his/her own actions and behaviors.
- ▶ Avoiding discussion of workplace conduct, concerns and conflicts in front of others without a need to know.
- ▶ Reporting inappropriate conduct through one of the channels made accessible to Sidra staff and other stakeholders.



Members of Sidra Management (including members of the Board of Governors and its committees, L2 Chiefs, Clinical Department Chairs, executive directors, and directors) are responsible for:

- ▶ Leading by example by demonstrating compliance with the Code of Ethical Conduct at all times.
- ▶ Requiring that each individual uphold the principles of the Code of Ethical Conduct.
- ▶ Creating and maintaining a work environment that encourages collaboration, cooperation, professionalism and respect.
- ▶ Providing an effective line of communication for issues to be raised and discussed without fear of retaliation.
- ▶ Working with available resources (e.g., Ethics and Compliance Division, Human Resources, Legal) to investigate reported violations of applicable laws, regulations, policies, procedures or the Code of Ethical Conduct, and initiate appropriate action.

Rights and Responsibilities

Sidra is committed to fostering a healthy and positive environment that respects the personal worth, dignity and diversity of each member of the Sidra community. All Sidra staff deserve to be treated fairly and equitably.

You have the right to:

- ▶ Work in a respectful environment.
- ▶ Be free from discrimination and harassment.
- ▶ Be assigned duties, privileges and promotions based on your job description, experience, performance and merit.
- ▶ Report actual or suspected violations of law or Sidra policies without fear of reprisal.

You have the responsibility to:

- ▶ Treat everyone in the Sidra community with respect.
- ▶ Provide the same high quality of care and treatment to all patients.
- ▶ Report, in good faith, any actual or suspected violations of law, Sidra policy or procedure, or the Code of Ethical Conduct.
- ▶ Make decisions about recruitment, work assignments, educational opportunities, promotions, discipline or terminations fairly and equitably.
- ▶ Fully and truthfully cooperate with investigations under the Code of Ethical Conduct and any related policies.



Compliance with Laws and Sidra Policies

Sidra staff are expected to be aware of and comply with all applicable laws, policies and procedures. If you are unsure how this applies to your roles and responsibilities, please do not hesitate to contact your Supervisor, Manager, Director, Chief or the Ethics and Compliance Division. Staff can also contact policyassistance@sidra.org.

In addition, all Sidra staff are expected to uphold the practices, principles and standards established by their respective professional colleges, faculties and regulatory bodies.

Conflicts of Interest / Conflicts of Commitment and Outside Activities

A staff member has a potential conflict of interest when that staff member has the ability to influence, directly or indirectly, a decision or action of Sidra that leads or could lead to a personal, financial or professional benefit for the individual or his or her family, or when an individual's interests or actions are adverse to Sidra's interests.

In order to maintain the highest standard of trust and integrity, it is expected that all Sidra staff will carry out their duties honestly, responsibly and in full accordance with the highest ethical and legal standards. Sidra recognizes that potential and actual conflicts of interest and commitment may arise, and has developed policies and procedures to ensure prompt reporting of such outside interests and commitments by Sidra staff.

Sidra staff are generally not allowed to be employed by other organizations and should avoid activities that could have a negative impact on their job performance, conflict with their obligation to Sidra, or negatively impact Sidra's reputation in the community. Due to the range and complexity of the activities of Sidra staff, it is not possible to provide an exhaustive list of situations in which a conflict of interest or commitment may arise. Sidra staff should refer to and be familiar with related policies and procedures related to conflicts of interest and conflicts of commitment.

Privacy, Confidentiality and Record Retention

Privacy and Confidentiality

Sidra is committed to protecting the privacy and confidentiality of information entrusted to the organization, including staff, patient, customer, and proprietary information. Sidra staff should not discuss confidential information in any public area, including hallways, stairwells, elevators, restrooms, dining areas and lobbies. In addition, Sidra staff are expected to understand and comply with Sidra's policies and procedures addressing the protection of confidential and proprietary information.

Accurate Records and Record Retention

Sidra must create and maintain complete and accurate records to meet its legal and financial obligations and to manage its business properly. All patient-related records, organization books, financial reports, expense accounts, timesheets, administrative records and other documents created in the ordinary course of business must be completed accurately, honestly and in accordance with Sidra policies and procedures. Creating false or fictitious records with respect to any activity conducted on behalf of Sidra is strictly prohibited. Sidra staff are responsible for the accuracy and completeness of any reports or records staff create or maintain.

All Sidra staff must be familiar and comply with related Sidra policies and procedures that prescribe how documents and records are to be retained and destroyed to facilitate Sidra's ongoing operations and promote compliance with applicable laws and regulations.



Employee Relations, Diversity and Fair Treatment

Sidra is committed to promoting policies and procedures that:

- ▶ Achieve equality, fairness, and due process;
- ▶ Foster a positive working and learning environment through proactive measures and consistent enforcement;
- ▶ Require that all members of the Sidra community be treated equitably and with dignity and respect;
- ▶ Address suspected discrimination and settle disputes quickly, fairly and as close to the source as possible; and
- ▶ Encourage all members of the Sidra community to be aware of their rights and responsibilities.

Fostering a healthy and positive environment, which recognizes and respects the personal worth, dignity, and diversity of each member of the Sidra community is consistent with the aims and objectives of Sidra's mission and values. As Qatar continues to invest in its people and build toward its National Vision 2030 and National Health Strategy vision of building the capacity of skilled and qualified national workforce, Sidra is a key resource in the alignment of these visions through the development, promotion, and retention of Qatari staff.



Discrimination, Harassment and Inappropriate Behavior

Sidra is dedicated to ensuring a positive and respectful environment for all Sidra staff, patients and visitors. Sidra will not tolerate any form of discrimination, harassment or inappropriate behavior. Everyone at Sidra is protected from discrimination, harassment and inappropriate behavior under Sidra's Code of Ethical Conduct.

Discrimination is behavior that unfairly distinguishes between individuals based on certain characteristics, including race, gender, color, ancestry, ethnic origin, marital status, age, disability, family status and religion.

Harassment is unwelcome conduct that may be perceived as offensive, intimidating, hostile, abusive, or as an unwanted sexual advance.

Inappropriate behavior is conducting oneself in a way that is undesirable, unsuitable, or improper. Inappropriate behavior can include degrading or demeaning comments, profanity or similar offensive language and gestures, and discussing workplace conduct, concerns and conflicts in front of others without a need to know.

Workplace Violence

Violence in the workplace can have devastating effects on the quality of life of Sidra staff and on the productivity of the organization. Violence is defined as any act or threat of physical violence, harassment, intimidation or other threatening behavior. This includes, but is not limited to, any actual or attempted assault (including sexual assault and physical attacks), threats, and verbal, psychological or sexual abuse. Sidra does not tolerate violence in the workplace or on its premises, including those premises outside of the hospital and offices. This is in keeping with Sidra's belief that a healthy and safe work environment is not only a goal but a valued commitment. Sidra will continue to take steps to ensure that all health and safety policies and procedures, including those related to workplace violence, are clearly communicated and understood by all Sidra staff.

Health and Safety

Workplace Health and Safety

Sidra is committed to health and safety in the workplace and ensuring the safety of patients and visitors to our facilities. Sidra provides and maintains an occupational health and safety program to promote a safe and healthy working environment. Sidra is committed to meeting or exceeding the workplace health and safety requirements established by Qatari law.

Our compliance and success in reaching these goals rests on organization-wide collaboration and cooperation.

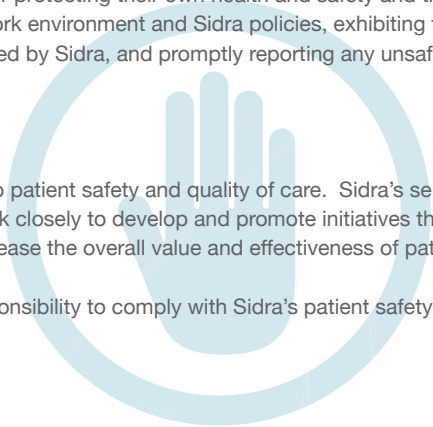
Sidra staff with management responsibility are accountable for the health and safety of all staff under their supervision, and must ensure that all staff work in accordance with Sidra's established safe work practices and procedures.

All staff are responsible for protecting their own health and safety and that of their colleagues by understanding their work environment and Sidra policies, exhibiting the safe work practices and procedures established by Sidra, and promptly reporting any unsafe equipment, practices or conditions.

Patient Safety

Sidra is also committed to patient safety and quality of care. Sidra's senior leadership and hospital departments work closely to develop and promote initiatives that enhance the delivery of safe patient care and increase the overall value and effectiveness of patient services.

All Sidra staff have a responsibility to comply with Sidra's patient safety and related policies.



Students and Teaching

Teaching, learning and research are central to Sidra's dedication to world-class medicine. As an academic teaching and research hospital affiliated with Weill Cornell Medical College, Sidra is committed to teaching and continuous learning.

It is important that patients and their families be informed that students may be involved in their care and that appropriate supervision and safeguards are in place. All students and faculty are expected to abide by Sidra's policies and procedures, as well as those of their respective faculties and educational institutions.

Research

Sidra is committed to protecting the rights of research subjects and following all applicable laws, regulations and ethical standards in the conduct of research. Sidra staff are expected to conduct research responsibly and with integrity to ensure quality review, management and reporting of research activities.



Media Relations

All inquiries from the media (including all forms of public media, such as print, radio, television, and internet) must be referred to Sidra's Communications Department in accordance with Sidra policy. The Communications Department will be responsible for managing all interactions with the media, including reviewing and responding to media inquiries and designating appropriate spokespeople.

Logo and Identity

As a highly visible organization, Sidra has an officially registered logo. This logo is a registered trademark and must be placed appropriately on all official Sidra literature, including materials such as letterhead, memos, agendas, brochures, educational materials and Sidra publications.



Supply Chain Ethics

Personal Integrity and Professionalism

All Sidra staff involved with purchasing or other supply chain-related activities must act, and be seen to act, with integrity and professionalism. Honesty, care and due diligence must be integral to all supply chain activities within and between Sidra and its suppliers and other stakeholders. Sidra supply chain staff may not engage in any activity that may create or appear to create a conflict of interest, such as accepting gifts or favors, providing preferential treatment, or publicly endorsing suppliers or products.

Accountability and Transparency

Supply chain activities must be open and accountable. In particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for Sidra. All participants must ensure that resources are used in a responsible, efficient and effective manner.



Reporting and Enforcement

All Sidra staff have an obligation to report violations or suspected violations of any applicable law or policy, including the Code of Ethical Conduct. Consistent enforcement and disciplinary action, up to and including dismissal or loss of privileges at Sidra, will be taken for all substantiated violations of laws, policies, and the Code of Ethical Conduct. Sidra will investigate all reported violations in accordance with Sidra policy.

Sidra has established a procedure that allows Sidra staff to report possible violations safely and without fear of reprisal. No Sidra staff may retaliate, harass or otherwise engage in retribution against any individual who, in good faith, reports a possible violation or assists or cooperates with any investigation conducted with respect to a possible violation. Sidra will take corrective action, up to and including dismissal or loss of privileges at Sidra, against any staff member who conducts or condones such retaliation, harassment or retribution.

Sidra staff may report a suspected violation to:

- ▶ A supervisor, manager, or Chief
- ▶ The Ethics and Compliance Division
- ▶ The Office of the General Counsel

For those who wish to remain anonymous, the report may be submitted through Sidra's Ethics Line. Sidra staff can find details of Sidra's Ethics Line on the Office of the General Counsel portal page.

Sidra will make every attempt to treat all reports confidentially and to protect anonymity if possible.



COMPLIANCE REFERENCES	Joint Commission International Accreditation Standards for Hospitals and Academic Medical Centers 6 th Edition (2017): GLD.12 and GLD.13
RELATED DOCUMENTS	<p>POL – O – Dignity at Work</p> <p>POL – O – Whistleblowing</p> <p>POL – O – Grievance</p> <p>POL – O – Corrective Action</p> <p>POL – O – Procurement</p> <p>POL – O – Anti-Corruption and Bribery</p> <p>POL – O – Gifts, Entertainment and Business Courtesies</p> <p>POL – O – Vendor Sponsorship</p> <p>POL – O – Declaration of Interests</p> <p>POL – O – Research Related Declaration of Interest</p> <p>POL – O – Confidentiality of Personal Health Information</p> <p>POL – O – Use and Disclosure of Personal Health Information</p> <p>POL – O – Confidentiality of Non-Patient Information</p> <p>POL – O – Retention, Storage and Disposal of Records</p> <p>POL – O – Facility Safety Policy</p> <p>POL – O – Mandatory Education and Training</p> <p>POL – O – Research Misconduct</p> <p>POL – O – Communications</p> <p>Ministry of Public Health - Patient's Bill of Rights</p>
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APPROVAL BODY	Executive Committee (Meeting 15.9 - 2015)

Version Number	Issue Date	Summary of amendments Key Changes	Communication Message
1	19/06/2016	New Document	