



# Code of Ethics and Conduct

Our Values in Action



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This document contains content that was created prior to the COVID-19 pandemic and does not demonstrate proper pandemic protocols. Please follow all recommended CDC guidelines for masking and social distancing.

# Welcome

This is an exciting time to be part of Mayo Clinic. As we continue to advance our 2030 Bold. Forward. strategy, the ways that we interact with patients and each other will continue to evolve. But one thing that won't change is the value that Mayo Clinic places on integrity. Our reputation for honesty and ethical behavior is at the heart of everything we do. Our Mayo Clinic values (RICH TIES) and Code of Ethics and Conduct guide us in our decision making while always placing the needs of our patients first.



Gianrico Farrugia, M.D.  
President and Chief Executive Officer  
Mayo Clinic



Christina Zorn  
Chief Administrative Officer  
Mayo Clinic



This photo was taken in compliance with Mayo Clinic's COVID-19 precautions.

# Our Legacy of Values

The acronym – “**RICH TIES**” – is used to help you remember each of our eight values and the connection they provide to the rich history of Mayo Clinic. The standards listed below describe a common purpose which embodies the Mayo Clinic Values that guide our behavior across the organization. We believe that everything we do affects every person, experience and encounter.

## Respect

Treat everyone in our diverse community including patients, their families and colleagues with dignity.

## Integrity

Adhere to the highest standards of professionalism, ethics and personal responsibility, worthy of the trust our patients place in us.

## Compassion

Provide the best care, treating patients and family members with sensitivity and empathy.

## Healing

Inspire hope and nurture the well being of the whole person, respecting physical, emotional and spiritual needs.

# “RICH TIES”

## Teamwork

Value the contributions of all, blending the skills of individual staff members in unsurpassed collaboration.

## Innovation

Infuse and energize the organization, enhancing the lives of those we serve, through the creative ideas and unique talents of each employee.

## Excellence

Deliver the best outcomes and highest quality of service through the dedicated effort of every team member.

## Stewardship

Sustain and reinvest in our mission and extended communities by wisely managing our human, natural and material resources.



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## BACKGROUND

Mayo Clinic is committed to providing outstanding patient care and conducting our business with integrity. When we behave with integrity, we adhere to the highest standards of professionalism, ethics and personal responsibility. By doing so, we are worthy of the trust our patients place in us. The Mayo Clinic Code of Ethics and Conduct (“the Code”) is a formal statement of Mayo Clinic’s standards and rules of ethical business conduct. Through the Code, we communicate our ethical standards to patients, Mayo Clinic’s trustees, officers, employees, students, short-term research appointees, volunteers, all Mayo Clinic subsidiaries, those with whom we do business and the public at large. Mayo Clinic is committed to preventing unethical or unlawful behavior, to halt such behavior as soon as possible after discovery and to provide corrective action to those who violate the standards in the Code.

## INTEGRITY AND COMPLIANCE PROGRAM

Mayo Clinic created its Integrity and Compliance program to uphold our commitment to the Code. The Integrity and Compliance Office oversees the Integrity and Compliance Program, which includes our Hotline reporting tool. Every report submitted to the Hotline is reviewed by Mayo Clinic’s Integrity and Compliance Office – no exceptions. Compliance officers are available as a resource for questions and concerns about the health care regulatory environment and business ethics. They work with department and division chairs, physician leaders and appropriate committees to ensure compliance with complex regulations. The Integrity and Compliance Office also provides education on compliance topics.

**Mayo expects you to speak up:** Compliance is everyone’s responsibility. Each of us who works at Mayo has a responsibility to report, in good faith, any known or suspected violation of Mayo policy, law or regulation.

## WORK WITH YOUR LEADERS

Mayo Clinic relies on all employees to understand and uphold Mayo Clinic’s Code of Ethics and Conduct. You can use this digital version located on the Integrity and Compliance intranet site to get answers to questions.

You should also work with your supervisor, work unit or department leader when you have questions. They understand how the Code impacts your specific area, and will help you understand the importance of knowing the Code and complying with it.

It’s important to all of us that we feel safe and empowered to bring concerns to supervisors and others. Your leadership has a responsibility to ensure that your concerns are thoroughly investigated and may contact the Integrity and Compliance Office or Human Resources to help find answers and resolve issues. Your supervisor will remind you of the antiretaliation policy and will offer you alternative ways to express your concerns, including the Hotline.

Mayo Clinic’s values of RICH TIES and our primary value—the needs of the patient come first—are often best lived as you work with your team. We should all do what we can to

promote an environment where team members feel valued and are encouraged to speak up when they see or experience concerning behavior.

## HOW DO I RAISE CONCERNS?

### Hotline

[MayoClinicHotline.com](https://mcsm.service-now.com/hrconnect/)

Toll-free: (888) 721-5391

### HR Connect

<https://mcsm.service-now.com/hrconnect/>

### Contact the Compliance Office

507-538-3437

[Contact a Compliance Officer](#)

## ADDITIONAL RESOURCES

[Compliance website – FAQs, Policies](#)

[The Code - Integrity and Compliance Newsletter](#)

# 1

## Safeguarding Information

Mayo Clinic relies on all of us to support its mission. One way you can do this is to protect [Confidential Business Information](#) (CBI). By definition, CBI is information that is not generally available to the public, including Mayo Clinic's competitors.

Examples of CBI include:

- Protected Health Information (PHI)
- Projected earnings
- Financial data and reports
- Business plans and trade secrets
- Unpublished research data

Every employee at Mayo Clinic is responsible for protecting CBI. This includes refraining from sharing CBI through social media. When sharing information outside of Mayo Clinic, it needs to be done in accordance with [policy](#). Employees need to understand different data classifications and their roles as data custodians to protect our CBI.

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# Information Security

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## MAYO CLINIC VALUES

### RICH TIES – Integrity, Stewardship

Technology is a critical part of delivering world-class care to our patients. An external cyberattack or internal misuse of systems and data could result in a data breach or system outage and put the safety of our patients at risk. Everyone who uses Mayo Clinic's computer systems and data has an individual responsibility to protect these valuable assets.



## PROTECT MAYO DATA

Your job will likely put you in contact with data that needs to be protected.

Health care information is valuable and criminal groups target health care companies to steal it.

There are some simple steps you can take to protect Mayo Clinic data, such as creating a unique password and never sharing it with others. Also remember that you should not reuse your Mayo Clinic passwords on personal accounts.



## USING TECHNOLOGY

Applications to do your work are provided on Mayo Clinic workstations and computers allowing you to collaborate securely from almost anywhere. Remote access is protected by your password and multifactor authentication. You should not use free web-based tools for collecting and storing information related to your work as this can put Mayo Clinic Data at risk. If you or your workgroup identify a need for new technology to do your work, follow the [Third Party Risk Management process](#) to request the new technology and tools.

Any portable device, such as a smartphone or tablet, that connects to Mayo Clinic enterprise networks or systems (including email) must be managed by Mayo Clinic's Mobile Device Management (MDM) system. We must also ensure that any portable device that stores CBI is equipped with device-level data encryption.

Review the [Computer, Internet and Electronic Communications policy](#).



## RECOGNIZE THREATS

### Keep these tips in mind:

- Treat email tagged with [EXTERNAL] in the subject line with extra care.

- Don't take action based on email, text messages or phone calls from unknown persons. Verify who you are communicating with using trusted contact information.
- Remember, you should never be asked to buy gift cards for Mayo Clinic staff.
- Learn how to recognize and report phishing email by completing required education modules. Review how Mayo Clinic's [Report Phishing system](#) works.

## ADDITIONAL RESOURCES

It is up to you to report problems and suspicious activity as soon as possible to help keep patients, employees and our network safe.

Report suspicious email with the Report Phishing button or forward messages to [phishing@mayo.edu](mailto:phishing@mayo.edu).

Report problems with computer systems or software to the Help Desk: 507-284-5500.

Report problems with medical equipment to Healthcare Technology Management (HTM): 507-538-1222.

Report suspicious activity on campus to your location's [Global Security office](#).

[OIS Awareness website](#)

# Patient Privacy



## MAYO CLINIC VALUES

**RICH TIES – Respect, Integrity**



## OUR PATIENTS

Protected health information (PHI) is any information about a patient that relates to their past, present or future health conditions, their eligibility for health care, their payment for health care, demographic information or even the fact that they are a Mayo Clinic patient. PHI is often deeply private and personal to our patients and they expect AND deserve to have their information protected. Mayo Clinic has a long-standing commitment to protecting the confidentiality of PHI.



## OUR WORKFORCE

Maintaining the confidentiality of PHI is the responsibility of everyone at Mayo Clinic. To meet that expectation, you are expected to complete privacy trainings and understand [Mayo Clinic's privacy policies](#).

You must always have a legitimate business or clinical need to access, use or disclose PHI. Accessing PHI for curiosity or any other improper reason can result in disciplinary action up to, and including, termination. You also have an obligation to report any situation where PHI may have been viewed, used or shared in violation of the Health

Insurance Portability and Accountability Act (HIPAA), state privacy laws or Mayo Clinic privacy policies. You can report any known or suspected privacy incidents to the Privacy Office via our online reporting tool on the [Privacy Office Website](#).



## OUR BUSINESS PARTNERS

Our vendors, suppliers and other third parties must also safeguard any PHI that they receive. Third Party Risk Management provides end-to-end management to help Mayo Clinic manage these risks and ensure that the appropriate safeguards and contracts are in place. Before sharing data with an outside organization or allowing third parties access to our networks or PHI, seek assistance from [Third Party Risk Management](#).



## FAQS

***Your neighbor's husband tells you outside of work that his wife was in a car accident and brought to Mayo Clinic. At work, you wonder how she is doing. Can you access her medical record to learn whether she is doing well?***

No. Accessing someone's medical record without a business or clinical need or a valid authorization violates their privacy and can subject you and Mayo Clinic to fines and penalties. The Privacy Office uses a monitoring tool to detect inappropriate access to the medical record.



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***Your coworker is out on parental leave and you want to send her a card. Can you access her medical record just to look up her address?***

No. Accessing someone's medical record for personal reasons, without a business or clinical need or a valid authorization on file is never appropriate, even if you don't mean any harm.

***You use your phone to take a selfie of you with a happy patient, and post it on social media with no name or other identifying information and simply state: "I love my job!" Is this appropriate?***

No. Full face patient photographs or photos that include unique characteristics, are considered PHI even without any other identifying information, and we cannot share PHI publicly without written patient authorization. Moreover, you should only take photographs of patients pursuant to our Photography policy and by using secure applications. To learn more about PHI and how to deidentify data, visit the [Privacy Office website](#).

## CONTACT INFORMATION & ADDITIONAL RESOURCES

[Integrity and Compliance Intranet site](#)

or call 507-266-6286 to learn more

[Contact a Privacy Officer](#)

[Privacy Reminders for Staff While Working Remotely](#)



# Social Media



## MAYO CLINIC VALUES

### RICH TIES – Respect, Integrity

Mayo Clinic supports staff involvement in community dialogue and participation in social media. Community dialogue is a vital way to make your voice heard on issues that are important to you. Social media can be a rewarding way to share your experiences and opinions with family, friends and coworkers around the world.



## OUR PATIENTS

Being mindful of patient privacy is critical as we navigate social media as Mayo Clinic employees. When posting online, remember Mayo Clinic's values and think about how your words could affect our patients, their families and our professional reputation. Be respectful to all so that we show our patients that we care and work to create a supportive environment.



## OUR WORKFORCE

Anything you do on social media may carry risks and responsibilities, especially if you are sharing information or opinions about another person. It is important to remember your online activity can live forever, even if deleted.

Following Mayo Clinic's social media guidelines can help you navigate these situations successfully. Others may see you as representing Mayo Clinic on social media even if you do not see it that way.

Be professional, use good judgment and be accurate and honest in your communications. Errors, omissions or unprofessional behavior reflect poorly on Mayo Clinic, and may result in consequences for you or our organization.

Remember that you should never share confidential information about Mayo Clinic or its patients on social media. For example, you should not post a photo of a patient you have helped. Use good judgment to ensure that your social media activity does not interfere with your work.



## FAQS

***You and others within your community witness a child who sustains a sports injury during a local sporting event. Later, you are involved in the care of the patient and are aware that her surgery was a success and she will be discharged and going home in a few days. You want to post a short message to your friends in the community to share the positive news. Can you post this message as long as you don't use the patient's name?***

This would be an inappropriate disclosure of patient information as you learned the information while working in your professional role at Mayo Clinic. Even by omitting



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a patient's name, there are several other elements of protected health information (PHI) that can identify a patient.

***In a post about a contentious local school board election, one of your Mayo Clinic colleagues, includes threatening language and references violence against people who hold opposing views. You and several other members of your work group have shared that you feel uncomfortable working around him. Does Mayo Clinic have a process to address situations like this?***

Yes. You and your colleagues should report this to your manager, Human Resources or the Compliance Office for further review of unprofessional behavior and conduct, even if it happens outside the workplace.

## ADDITIONAL RESOURCES

[Mutual Respect Policy](#)

[Social Media Policy and Guideline](#)

[Mayo Clinic News Network](#)

Official Mayo Clinic Social Media Outlets:  
Approved stories and news

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## Behaving Honestly

It's not uncommon for Mayo Clinic staff members to find themselves interested in activities like starting a new business venture, providing consulting service to industry, speaking engagements with industry, or serving on a for-profit board of directors.

Relationships with industry can facilitate the advancement of innovative ideas and discoveries, both of which ultimately benefit the general public through the transfer of scientific discovery. These activities are consistent with Mayo Clinic's mission if the activities involve a two-way exchange of ideas in which each party benefits from the interchange or the activity could lead to meaningful support for Mayo Clinic's research, education or clinical practice missions.

When building a relationship with any for-profit commercial company, such as pharmaceutical and medical device manufacturers, other care professionals or patients, do not let your personal financial interests come into conflict or appear to be in conflict with the interests of Mayo Clinic. Accepting gifts from vendors, business partners or patients can be viewed as inappropriate. Under no circumstances should you offer, solicit or accept anything of value that could be perceived as an unfair advantage of any kind.

As a Mayo Clinic employee, your responsibility is to behave in ways that support a collegial, honest and fair environment.

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# Conflicts of Interest



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## MAYO CLINIC VALUES

**RICH TIES – Integrity**



## OUR PATIENTS

Mayo Clinic patients expect and deserve quality care. When staff participate in community or industry activities, patient care and privacy must always be respected. When building relationships with our patients, you should not behave in ways that suggest you are benefiting from that patient relationship. Patients may offer you gifts or money. While the gift may be heart-felt, you must consult Mayo's Gifts From Patients policy for guidance if you are unable to politely decline.



## OUR WORKFORCE

You should make sure you have the appropriate institutional approval from the Medical-Industry Relations Committee for all your external activities with industry. It is also important for you to be transparent and disclose all your personal financial interests to Mayo Clinic that might influence, or appear to influence, your decisions or actions as a Mayo Clinic employee.

Interacting with product and service suppliers, as well as referring providers, can present ethical and legal problems. To ensure that Mayo Clinic staff avoid conflicts of interest and potentially illegal situations, Mayo Clinic has developed policies to answer your questions and help you avoid problematic situations. Become familiar with this information as you broaden your industry and business relationships. As a Mayo Clinic employee, you are expected to treat people fairly and not take advantage of your employee status for personal gain.

Because we value the integrity of our business relationships, personal gifts of any kind cannot be accepted from a vendor or business partner of Mayo Clinic. Suppliers, other companies or individuals conducting business with Mayo Clinic may try to offer staff gifts of cash, food, entertainment, tickets, travel or other benefits. These offers must be politely declined.



## OUR VENDORS & BUSINESS PARTNERS

When Mayo Clinic enters a business relationship with vendors and other business partners, we create a legal relationship with that organization. Mayo Clinic expects these organizations to act within the legal framework of our contracts. We also expect suppliers and their sales representatives to behave in a manner consistent with Mayo Clinic policy, industry standards and applicable law.



## SUMMARY/SCENARIO

Personal financial interests should not influence your decisions or actions as a Mayo Clinic employee.

Your external activities should not compete with Mayo Clinic business or have a negative impact on job performance or Mayo Clinic's reputation in the community.

Mayo Clinic resources are provided to staff to support patient and business needs and should not be used for personal gain.

***You have started a medically-related company and you are not sure how to keep your outside business activities separate from your Mayo Clinic responsibilities.***

Call the Conflict of Interest Review Office. The team will assist you by putting a conflict of interest management strategy in place to help you keep separation between your outside business activities and your Mayo Clinic responsibilities.

## ADDITIONAL RESOURCES

[Conflict of Interest intranet page](#)

[Medical-Industry Relations Committee intranet page](#)

[Gifts from vendors or business partners - Policy](#)

[Gifts from patients - Policy](#)

[Mayo Clinic Supplier information page](#)

[Supplier and Sales Representative Code of Conduct \(PDF\)](#)

# Bribery and Corruption

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## MAYO CLINIC VALUES

**RICH TIES – Integrity**

for gifts, payments or other inappropriate remuneration should be reported the compliance department.



## OUR PATIENTS

Our patients expect that we conduct our business in a truthful, open manner. They will get exceptional health care at Mayo Clinic because we have the best health care teams. They will be treated well because of our reputation for integrity and our Mayo Clinic values. If our reputation is damaged because of corrupt actions, patients will not see us as trustworthy. We must all do what we can to maintain patient trust.



## OUR BUSINESS PARTNERS

Mayo Clinic is committed to conducting business with integrity and expects the same of anyone conducting business on behalf of Mayo Clinic. If you suspect anyone connected to Mayo Clinic is engaged in corrupt acts, you must contact the Integrity and Compliance Office or the Legal Department. Corruption will dramatically erode the trust of our patients, business partners and regulators and could subject Mayo Clinic to significant financial and criminal repercussions.



## OUR WORKFORCE

As a Mayo Clinic employee, you are expected to behave honestly and with integrity. As an employee, you should never use Mayo Clinic funds or assets for any unlawful or unethical purposes. You should also not make any payments to third parties for any purpose other than that shown in Mayo Clinic's records.

Offering something of value to a government employee to influence a government decision, obtain business or keep business is illegal and against Mayo Clinic policy. This could include offers of cash, gifts, complimentary health services or even job opportunities. Any requests from third parties



## FAQS/SCENARIOS

***What if I need to offer or accept a culturally appropriate gift for a business relationship?*** Contact the Integrity and Compliance Office to help you respond appropriately, in accordance with [existing guidance on food and gifts](#).

**Scenario 1:** Mayo Clinic employee Susan is negotiating a business arrangement with Michael from XYZ Corp. Michael suggests he could offer better agreement terms if Susan could get Michael's daughter a job at Mayo Clinic. Michael is offering a corrupt advantage (better contract terms) by acting contrary to the performance of his duties in exchange for a bribe (a job for Michael's daughter). Susan must refuse and report the request to the Integrity and Compliance Office

**Scenario 2:** Oliver is trying to sign a lucrative deal with Invest-Right Company. The CEO of Invest-Right offers Oliver first-class travel to a luxury resort where they can discuss the opportunity. Invest-Right may be using the luxurious travel and accommodations to gain a corrupt advantage in the negotiations (influencing Oliver to act contrary to the performance of his Mayo Clinic duties). Oliver should request to meet at a site related to the deal and make travel arrangements through Mayo Clinic's business travel processes.

**Scenario 3:** David needs to obtain a government license for Mayo Clinic from a foreign government. After encountering bureaucratic red tape, an official gives David the name of a consultant service that can help move Mayo Clinic's application to the front of the line and guarantee its approval. The official is likely seeking to arrange a bribe through the consultant. David must contact Compliance for guidance.

## ADDITIONAL RESOURCES

[International Anti-Corruption Policy](#)

[International Anti-Corruption Due Diligence Policy](#)

[Gifts and Entertainment - International Business Activities](#)



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## MAYO CLINIC VALUES

**RICH TIES – Integrity**



## OUR PATIENTS

Mayo Clinic assets are more than equipment, inventory, funds, email, internet, software and office supplies. Assets include medical records, concepts, financial data, intellectual property rights, research data, business strategies and plans about Mayo Clinic activities.

Patients directly benefit from Mayo Clinic's assets. Protecting our assets is another way that we protect our patients and provide the best patient experience.



## OUR WORKFORCE

Mayo Clinic assets are to be used solely for the benefit of Mayo Clinic and our patients. You may not use Mayo Clinic assets for your personal gain.

The use of Mayo Clinic funds or assets for any unlawful or unethical purpose is prohibited. Payments to third parties must be accurately reflected in Mayo Clinic records.

Any intellectual property developed by Mayo Clinic personnel on their personal time, not involving use of Mayo Clinic facilities or resources and not related to their Mayo Clinic duties or Mayo Clinic's business, including its research, clinical and educational programs, must be brought to the Medical-Industry Relations Committee for adjudication of ownership.



## OUR BUSINESS PARTNERS

The use of Mayo Clinic funds or assets for any unlawful or unethical purpose is prohibited. Payments to third parties must be accurately reflected in Mayo Clinic records.



## SCENARIO

***Anna's daughter is fundraising for her soccer team and is selling cookies. Anna wants to support her daughter and knows some of her coworkers love the brand of cookies she is selling. When she gets to work she opens her laptop and sends the cookie fundraiser information to her departmental distribution list.***

The [Solicitation and Distribution Policy](#) indicates that you cannot use Mayo Clinic email for personal benefit. While

these causes are admirable, Mayo Clinic resources should be used for business purposes only. Talk with your Manager or Compliance Officer for further guidance or questions.

## ADDITIONAL RESOURCES

[Third Party Risk Management \(TPRM\) Policy](#)

[Mayo Clinic Ventures](#)

[Mayo Clinic Ownership of Intellectual Property, Inventions, Data and Other Assets Policy](#)

[Intellectual Property - Royalty Sharing Policy](#)

[Business Associate Policy](#)

[Solicitation and Distribution Policy](#)

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## Workforce Support

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# Employee Safety & Health

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## MAYO CLINIC VALUES

**RICH TIES – Teamwork**



## OUR PATIENTS

Mayo Clinic encourages safe patient interactions, and you have the right to feel safe at work when interacting with our patients and visitors. If you encounter disrespectful, derogatory or discriminatory behavior, address the behavior in the moment (provided it is safe to do so), contact [Patient and Visitor Conduct](#), and reference the [Patient Misconduct and Behavior Management Procedure](#). If physically volatile or threatening behavior is encountered, secure your safety, seek support from nearby staff and contact [Security](#).



## OUR WORKFORCE

All of us who work at Mayo Clinic know the importance of maintaining a safe, secure and healthy environment for our patients, their family members and our colleagues. Each of us must do our part to create this environment by actively engaging in safe behaviors. We need to follow Mayo Clinic's safety policies and procedures, identify and manage workplace hazards and support emergency preparedness and response initiatives.



## OUR VENDORS

When working with vendors, we expect a high level of safety and quality. If their products fail, Mayo Clinic may also be seen as failing. We take many steps before we purchase products to ensure safety and quality. If you are working with a vendor or a product and suspect safety issues, discuss this with your supervisor so the right steps can be taken to resolve any potential safety concerns.

Part of maintaining a safe environment is maintaining our own health and well-being. Our work areas, even when working remote, should be safe places and support our health. Mayo Clinic strives to provide staff with ergonomically appropriate work areas as part of Mayo Clinic's commitment to a safe, healthy workplace.

If safety or health is compromised, please tell your supervisor. Each of us is responsible for reporting

- workplace injuries
- security incidents
- aggravation or reoccurrence of previous injuries
- illnesses

As Mayo Clinic employees, we comply with all applicable federal, state and local laws. Mayo Clinic employees should always cooperate with government inspectors and law enforcement, in consultation with Legal and Global Security as appropriate.



## FAQS/SCENARIO

**What should I do if I see something unsafe?** If you have an emergency, call 911 or contact Security. If not an emergency, alert your manager and report it to [safety@mayo](mailto:safety@mayo).

**I am working remotely and need some help with the ergonomics of my home office.** Please visit the Safety Intranet site list of [Frequently Asked Questions](#) for tips on working at home.

**Scenario:** Mary is working the night shift as a nurse in the emergency department. One night, a patient becomes verbally and physically abusive because she doesn't like the treatment being administered by Mary and the other staff. Mary, who has recently been through a de-escalation training class, successfully calms the patient down, but not before the patient had scratched Mary's arm. Following the incident, Mary reports what had happened to the Mayo Clinic Global Security department and to her supervisor to ensure proper documentation of the events can take place.

## ADDITIONAL RESOURCES

[Safety Policies](#)

[Safety Intranet Site](#)

[Patient and Visitor Conduct](#)

[Security Intranet Site](#)

# Mutual Respect



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## MAYO CLINIC VALUES

### RICH TIES – Respect



## OUR PATIENTS

Mayo Clinic's employees, patients and visitors expect an environment that fosters mutual respect, free from harassment and discrimination. Mayo Clinic's diverse community is strengthened when we act with compassion, integrity, consideration and cooperation.

Sometimes, we may experience discord, frustration or conflict within our work departments. All of us should strive to ensure that every employee has a voice and a place to express concerns or ask questions.



## OUR WORKFORCE

We are committed to creating a healthy work environment of mutual respect by promoting a spirit of professionalism, teamwork, cooperation and inclusion among all people, in support of Mayo Clinic values.

Mayo Clinic relies on all of us to work across disciplines and job roles as team members, committed to our patients. If someone uses language or behavior that promotes violence or discrimination, this should be

reported. Mayo Clinic will investigate and take fair and consistent action. The Mutual Respect Policy and Social Media Policy and Guidelines provide more information about this topic.

If you feel comfortable, we encourage you to communicate with co-workers to try to work out differences, allowing both parties to better understand each other.

If you have concerns, you can make contact with your Human Resources Advisor by visiting the HR Connect homepage. You can also talk with your department leadership for department-specific concerns. Reports made in good faith are protected under the anti-retaliation policy.



## OUR VENDORS

Mayo Clinic expects our vendors to show Mayo Clinic staff respect when they interact with us, whether in-person or virtually. You do not have to tolerate disrespectful treatment from vendors, whether abusive language or lack of professionalism. Vendors are expected to follow the rules we provide for them as presented in [Mayo Clinic standards and code of conduct for healthcare industry and supplier/sales representatives](#).



## SCENARIO

***A colleague is showing interest in you personally, such as repeatedly making comments about your appearance, inviting you to join them for lunch and giving you gifts. After you ask them to stop, the behavior continues. The acts make you feel uncomfortable.***

Employees have the right to work in an environment free from all forms of conduct that can be harassing, coercive or disruptive. There are several ways that this behavior can be addressed. Attempt to resolve the concern with the employee if you feel safe. If the behavior continues or if you feel unsafe, report to your supervisor, Human Resources or the Integrity and Compliance Office. If you ever witness harassing conduct, make sure the subject of the harassment is safe and report the incident. For additional information, reference the [Sexual and Other Harassment policy](#).

## ADDITIONAL RESOURCES

[Mutual Respect Policy](#)

[Anti-Retaliation Policy](#)

[Integrity and Compliance Hotline](#)

[HR Connect intranet site](#)

[Supply Chain Reporting tool](#)

[Nondiscrimination Policy](#)



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## Social Responsibility

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## MAYO CLINIC VALUES

### RICH TIES – Stewardship

#### Environmental Stewardship from patient to planet

Mayo Clinic recognizes the link between environmental health and public health and is committed to responsible environmental protection practices in patient care, education, research and administrative operations, to benefit the health of our patients, staff and communities. We do this by exercising a thoughtful and sustainable approach to environmental stewardship and ask that you do your part to support Mayo Clinic's sustainability goals.



## OUR PATIENTS

Part of the Mayo Clinic experience is the comfort our patients take in our spaces. They appreciate our efforts to maintain our facilities and respect the environment as we do. A welcoming, clean environment has a positive impact on their health and health care.



## OUR WORKFORCE

Each of us can take steps to be good stewards of our work areas and Mayo Clinic. Here are some steps you can take:

- Conserve energy. Be mindful of your energy consumption. Turn off lights when you leave a room, power down noncritical equipment at the end of the day and close fume hoods in laboratory spaces.
- Reduce waste. Choose reusable utensils when dining in the employee cafeteria, consider using a reusable water bottle, don't print unless necessary, recycle everything you can at your site and ensure all waste is disposed of properly.
- Develop a stewardship mindset. Consider the environment in your daily activities and seek opportunities for your work unit to operate more sustainably. Consider joining the [Green Advocate program](#) if you have an interest in and passion for environmental sustainability.



## DID YOU KNOW?

Mayo Clinic has operated its own Recycling Center on the Rochester, Minnesota, campus since 1990. The Recycling Center shreds paper, bales cardboard, sorts metals from construction projects and processes plastic and other materials so they are packaged appropriately to transport to recyclers. Although not quite as large, the Florida campus also operates a recycling area where some recyclables are processed. Mayo Clinic in Arizona and Mayo Clinic Health System sites contract with vendors to perform recycling services.

## ADDITIONAL RESOURCES

[Green at Mayo Clinic](#)

[Our Environmental Statement](#)

[Energy Policy](#)

[Energy Management Guidelines](#)

[Environmentally Preferable Purchasing Policy](#)

[Waste Management and Recycling Policy](#)

[Mercury Elimination Procedure](#)

[Sustainable Building Policy](#)

[Environmental Stewardship External Website](#)

Have a question or suggestion to improve Mayo Clinic's environmental footprint? Email [officeofsustainability@mayo.edu](mailto:officeofsustainability@mayo.edu).

# Community Engagement



## MAYO CLINIC VALUES

**RICH TIES – Stewardship**



## COMMUNITY CONTRIBUTIONS

Mayo Clinic provided more than \$11.5 million in philanthropic support to hundreds of nonprofit organizations in 2021. We collaborate with nonprofit organizations to address community health needs, disparities and support for those in need. More than 1.5 million people have been helped by Mayo Clinic philanthropic support. In addition, in 2021, Mayo Clinic provided \$49 Million dollars in charity care to patients in need.

Community Engagement works with local public health and other organizations across Mayo Clinic communities to conduct regular assessments of community health needs. These priority areas guide our work with other volunteers, organizations and agencies to improve community health for all residents, and especially those with the highest health disparities and challenges.



## STAFF GIVE BACK

Mayo Clinic staff support local communities in various ways. One way is through the annual Community Giving campaigns. These campaigns serve local charities or resources by allowing Mayo Clinic staff to directly contribute funds to need-based organizations. Employees are encouraged to participate in these campaigns either by donating time to help organize the work or donating funds to support the work.

### ADDITIONAL RESOURCES

[Community Engagement Website](#)

[Mayo Clinic Cares Intranet Site](#)



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Channel One Regional Food Bank, Mayo's Season of Giving.

# Political Activity



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## MAYO CLINIC VALUES

### RICH TIES – Integrity

Mayo Clinic encourages you to participate in the political process on personal time. As you do so, remember to be mindful that those activities should not suggest that Mayo Clinic shares your political opinions. This is important to maintain Mayo Clinic's not-for-profit status. As a condition of that tax-exempt status, tax regulations limit Mayo Clinic from conducting certain political activities. This prohibition applies to all Mayo Clinic entities, as well as to your activities as a Mayo Clinic employee. Any use of Mayo Clinic resources to distribute statements supporting or opposing any political candidate or position or to engage in political fundraising, is prohibited.



## OUR PATIENTS

Our work at Mayo Clinic requires us to engage with our patients in a politically unbiased manner. We have our political beliefs, but those beliefs should not be part of our interactions with patients or their families. Out of respect for our patients, you should refrain from discussing political views. Redirect the conversation if patients raise the topic.



## OUR WORKFORCE

Mayo Clinic supports your participation in the political process outside of Mayo Clinic. Keep in mind that Mayo Clinic, as a tax-exempt organization, must ask you to follow some basic rules about political activity:

- When participating in personal political activity and advocacy, do not refer to Mayo Clinic as your employer or to your position at Mayo Clinic. For example, do not wear your Mayo Clinic identification badge at these events.
- If your title or affiliation with Mayo Clinic is used to identify you, you must clearly share that your views are your own and do not represent Mayo Clinic.
- Do not otherwise position yourself as a Mayo Clinic representative when you participate in political activities.
- Do not use Mayo Clinic resources, including facilities, email, equipment and supplies, to prepare political materials or distribute political statements.

If you are a leader at Mayo Clinic, stricter limitations on political activities, such as public endorsement or advocacy on issues, may apply. See [Political Activity Matrix](#) for more information.



## FAQS

***I am interested in being involved with a social activist group. Does Mayo Clinic allow this?***

Mayo Clinic encourages you to participate in the political process outside the workplace. Your personal political activity, however, should not reference Mayo Clinic or your position at Mayo Clinic.

***I want to do something to contribute to my community, so I am running for an open City Council seat. As a Mayo Clinic employee, what is expected of me to ensure that the political activity policy is followed?***

Employees are encouraged to participate in the political process. You should not use Mayo Clinic resources, such as Mayo Clinic email. Do not give the impression you are speaking or acting on behalf of Mayo Clinic. The Integrity and Compliance Office is available to answer any specific question if you choose to run for any type of public office.

## ADDITIONAL RESOURCES

[Political Activity Policy](#)

[Social Media Policy](#)



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## Embracing Differences

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# Equity, Inclusion & Diversity

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## MAYO CLINIC VALUES

**RICH TIES** – Respect, Integrity, Compassion,  
Healing, Teamwork



## OUR PATIENTS

Mayo Clinic welcomes patients from all backgrounds and cultures and is committed to maintaining an inclusive environment for all patients. At Mayo Clinic the needs of the patient come first and in support of that mission we strive to inspire hope and contribute to health and well-being by providing the best care to every patient through integrated clinical practice, education and research.

similarities and differences of all of our employees, regardless of race, gender, religion, sexual orientation, religion, nationality, disability or other protected status, Mayo Clinic will continue to foster an environment of inclusion that allows us to deliver culturally sensitive, competent care, enhance our research pools, improve the quality of education delivered to our learners and, ultimately, deliver world-class, patient-focused care. [Mayo Employee Resource Groups](#) play a key role in enhancing our culture, connecting our teams and impacting our communities.

Fostering mutual respect in our work lives and personal lives is everyone's responsibility. Our commitment to the policies and practices put in place to support equity, inclusion and diversity are indispensable in helping Mayo Clinic continue to put the patient first. This commitment can be seen in our recruitment and talent development efforts and the commitment of our leaders to diversity and inclusion across all aspects of our organization.



## OUR COMMITMENT

In July 2020, Mayo Clinic announced a bold commitment against racism and committed \$100 million over ten years in support activities to improve health disparities

for the communities we serve. The goal of Mayo Clinic's [Commitment Against Racism](#) is to ensure each person, no matter their race or ethnicity, will not experience racism and discrimination.

As part of this commitment, site and shield teams have developed objectives, strategies, timelines and metrics for plans to address systemic racism within Mayo Clinic, including increasing the diversity of its patient population and staff. Further, Mayo will employ its strategies to measurably improve health equity [across 3 categories](#): Foundational, Core, and Aspirational.



## FREQUENTLY ASKED QUESTIONS

**How can I get involved?**

Visit the [Mayo Employee Resource Groups](#) site.

**What are Department Diversity Leaders?**

Visit the [Department Diversity Leader Resources](#) site.

**How do I learn more about Mayo Clinic's Equity, Inclusion & Diversity initiatives?**

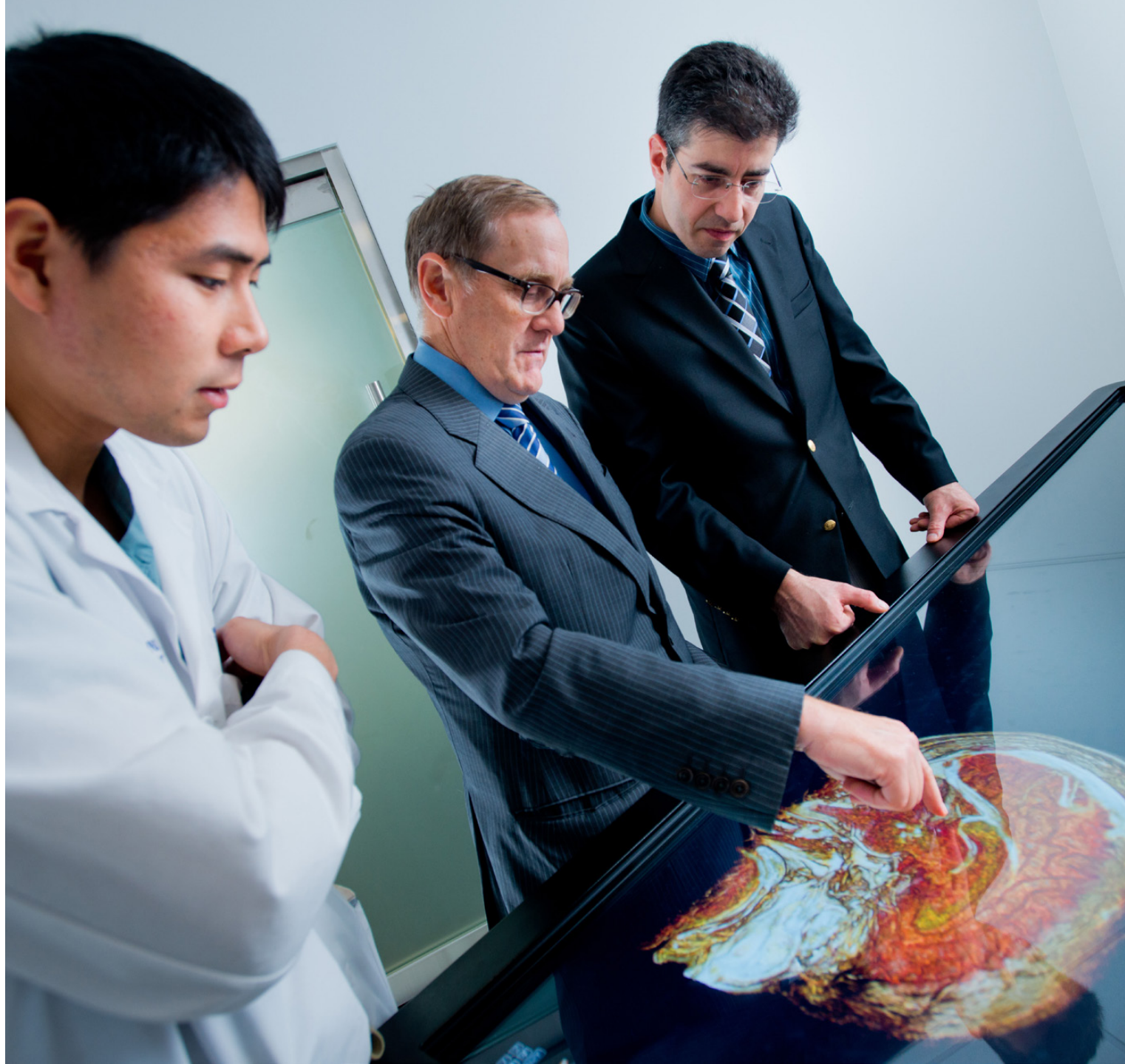
Visit the [Office of Equity, Inclusion & Diversity](#) site.



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## Responsible Business Practices

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# Financial Integrity – Patient Billing



## MAYO CLINIC VALUES

**RICH TIES – Integrity**



## OUR PATIENTS

Mayo Clinic seeks to provide patients with accurate and transparent information about billing. As health care consumers, patients deserve to know and understand how their money is used to provide care. We offer a variety of tools and services to assist our patients to anticipate future bills.



## OUR WORKFORCE

Mayo Clinic works with well over 1000 different payers including private and government insurers. Ethically and legally, we must document and bill accurately. Patients have the right to appropriate care. Mayo Clinic has a right to appropriate reimbursement and payers have an obligation

to be sure their dollars are going to medically necessary care. Mayo Clinic's documentation, coding and billing are governed by the fraud, waste and abuse laws. These laws forbid intentional and accidental overbilling. If Mayo Clinic's internal review shows Mayo Clinic was overpaid, Mayo Clinic refunds the payer and makes the required disclosures. Mayo Clinic wants to bill fairly and be paid fairly. If you have a concern or a question, say something. As always, reports in good faith are protected under the anti-retaliation policy.

### False Claims Act

Mayo Clinic is committed to preventing and correcting billing errors involving Medicare, Medicaid and its other payers. The federal government and many states have False Claims Act laws to penalize billing fraud, waste and abuse. If you suspect billing errors are occurring, you have an obligation to report these to leadership or the Integrity and Compliance Office. Employees who report in good faith will be protected from retaliation. The Integrity and Compliance Office can provide more information and resources on billing issues.



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## RELEVANT DEFINITIONS

### Fraud:

Intentionally submitting incorrect or false information to receive a benefit.

### Waste:

The misuse of resources that results and unnecessary costs to a government program or an overuse of services.

### Abuse:

Receiving payment that we're not entitled to for things like services or supplies.

### Payer:

Private or government insurers or in some cases an individual who self-pays.

## ADDITIONAL RESOURCES

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[Revenue Cycle Compliance](#)

[Prevention of Fraud, Waste and Abuse Policy](#)

[Anti-Retaliation](#)

[Record Retention Policy](#)



# Financial Integrity – Books & Records



## MAYO CLINIC VALUES

**RICH TIES – Integrity**



## OUR WORKFORCE & PARTNERS

Federal law requires that Mayo Clinic's books and records accurately reflect the true nature of the transactions represented. You must not create or be a part of the creation of any records intended to mislead or to hide anything that is improper.

It is against Mayo Clinic policy to knowingly cause Mayo Clinic's books and records to be inaccurate.

Falsifying records can include making records appear as though payments were made to one person when payments actually were made to another, submitting expense accounts which do not accurately reflect the true expense or creating any records that do not accurately reflect what occurred.

Permanent entries in Mayo Clinic records must never be altered.

Payment may not be made if any amount will be used for a purpose other than that described in the documents supporting the transaction.

Slush funds or similar off-book accounts, in which there is no accounting for receipts or expenditures on corporate books, are strictly prohibited.

### Record Retention

Mayo Clinic's records create a history of our relationships with our patients, staff and business collaborators. Many of these records are required by law and are retained based on the applicable laws. These records range from employee records to tax and finance records to research records.

Responsible business practices require that relevant records must not be destroyed if any litigation, government investigation or audit is occurring. Until the matter is closed, destroying records to avoid disclosure



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in a legal proceeding may be a criminal offense. If you have questions about this, please review the Record Management and Retention Policy.

### Government Investigations

Mayo Clinic cooperates with government investigations. Mayo Clinic does not prohibit you from communicating with a government authority. The Legal Department should be contacted immediately about any unexpected government interview or investigation. For more information about your rights regarding government investigations, reference the [Government Investigation Policy and Procedure](#).

### ADDITIONAL RESOURCES

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[Records Management and Retention Policy](#)

In addition to the policy, contact Legal or a Compliance Officer with any outstanding questions.

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We know that this Code of Ethics and Conduct can't answer all of your questions. Fortunately, you have a dedicated Mayo Clinic Compliance team ready to support you. The Integrity and Compliance Office has experts in international business, data use, US Food and Drug Administration regulated manufacturing, research, education, patient privacy, billing, conflict of interest and more. We're available to partner with you to help make your career at Mayo Clinic a success.

## CONTACT INFORMATION

[Connect with a Compliance Officer](#)

[Integrity and Compliance Intranet Site](#)

[Compliance Hotline](#) or call: 888-721-5391

[Ask Compliance a question](#)

[Ask Privacy Office a question](#)

“ I would admonish you, above all other considerations, to be honest. I mean honesty in every conception of the word: Let it enter into all the details of your work.”

–William J. Mayo, M.D.