

# Code of Ethical Conduct

*The Right Thing to Do and How to Do it Right!*



Princeton  
HealthCare System

Redefining Care



Princeton HealthCare System consists of the following units and programs:

- University Medical Center of Princeton at Plainsboro
- Princeton House Behavioral Health
- Princeton Rehabilitation
- Princeton HomeCare
- University Medical Center of Princeton at Plainsboro-Surgical Center
- Princeton HealthCare System Foundation
- Princeton HealthCare System Community Education & Outreach
- Princeton HealthCare System Occupational Health
- Princeton HealthCare Management Services

Please keep in mind... Throughout this document we use the term “patient” to describe the people we serve. Construed more broadly, it includes patients, clients and consumers who use the programs, products and services we offer.

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# Dear Colleague

May 2012

At Princeton HealthCare System, we are redefining care. We are deeply committed to providing high-quality services and care to the people we serve in an ethical and responsible manner. We are also committed to maintaining the highest ethical standards and remaining in compliance with the many laws governing the highly regulated health care industry. To ensure that we keep these commitments, we have implemented a Corporate Compliance Program.

The *Code of Ethical Conduct* is a key part of the compliance program. I encourage you to keep it as a handy reference guide for your daily activities after you complete your compliance training. Not following the standards in the Code could harm the interests of our patients, seriously damage PHCS' reputation, lead to employee disciplinary action, or even to government regulatory or private consumer action.

Each of us is responsible for upholding the standards outlined in the Code. If you know or suspect that one of our standards is not being followed, you must report it. Your report can be made anonymously and without fear of retaliation. To make the reporting process easier, we have appointed a Chief Compliance Officer and established a toll-free hotline ([1.800.779.4035](tel:18007794035)). In addition, you may reach out to me if you wish to report or discuss a concern.

The PHCS Board of Trustees and senior management staff have pledged their support along with me to uphold the *Code of Ethical Conduct* and the Corporate Compliance Program. Your commitment is also essential to keeping the needs of the people we serve at the heart of all we do.

Sincerely,



Barry S. Rabner  
President and CEO  
Princeton HealthCare System

# Code of Ethical Conduct

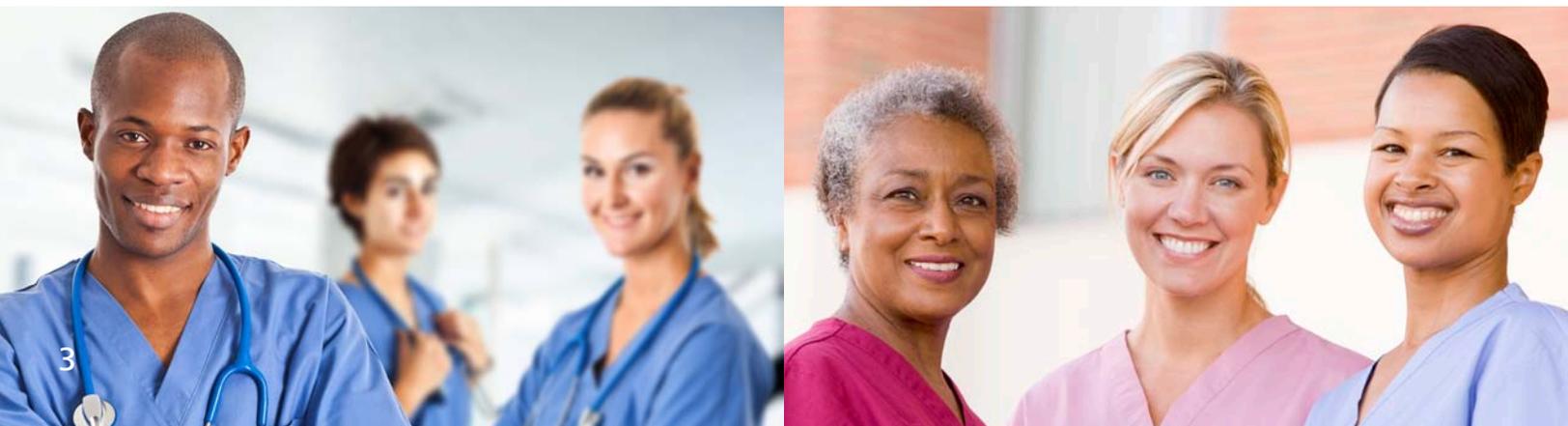
## Introduction

At Princeton HealthCare System (PHCS), we are committed to doing the right thing. We serve our patients and treat our employees and colleagues in an ethical, legal and responsible manner. We carry out our responsibilities in compliance with all applicable laws, regulations and guidelines, as well as with our own policies and procedures and PHCS mission, vision, and values.

The *Code of Ethical Conduct* is a guide to help us do the right thing. It applies to everyone – employees, managers, medical staff, volunteers, our contractors and vendors, members of the Board of Trustees, and anyone else acting on behalf of our organization. Failure to comply could impact negatively upon the interests of our patients; result in serious damage to our standing in the community, and regulatory or disciplinary action against the corporation and individual employees.

If you have any questions about the *Code of Ethical Conduct* or about any PHCS policies or practices, ask your supervisor, our Human Resources staff or the Chief Compliance Officer. PHCS managers and supervisors have a special obligation to be available and responsive to employees when questions arise about the Code. If you are not satisfied with management's response on application of the Code, raise your concerns to the Chief Compliance Officer, to the PHCS Compliance Hotline, or to the highest level of management.

The *Code of Ethical Conduct* is a series of standards to guide our behavior in today's healthcare environment. It provides general guidance, but does not replace PHCS policies and procedures. In the absence of a specific policy, the Code becomes the policy. If you perceive a conflict between the Code and a policy, please contact the Chief Compliance Officer. The Code is a "living document," which will be updated periodically to respond to changing conditions. Thus, PHCS reserves the right to change any or all of these provisions at any time.



## Code of Ethical Conduct

### **Mission Statement of Princeton HealthCare System (PHCS)**

The Mission of Princeton HealthCare System is to be the focal point of a comprehensive community health system that responds to the healthcare needs of our service area residents. Princeton HealthCare System will provide inpatient and outpatient care, community health education, medical education, and should promote medical and scientific research when appropriate. It is integral to the Mission of Princeton HealthCare System to continually improve quality of service to our patients and community and to provide appropriate healthcare to all.

### **Vision Statement of Princeton HealthCare System**

Princeton HealthCare System is a premier, integrated healthcare system that strives to anticipate and respond to the lifelong needs of the residents of Central New Jersey and beyond by providing excellent clinical care. Princeton HealthCare System is recognized for its commitment to enhancing the health of its community; providing superior services to its patients, delivering outstanding value, embracing clinical innovations; providing exceptional medical and health education; and supporting a knowledgeable, skilled and caring medical and employee staff.

# VALUES of PHCS Physicians and Our Entire Staff, Our Health Professionals

### Responsiveness

Excellent medical care is based on continuous healing relationships. Health professionals should provide care and be responsive at all times (24 hours per day, every day). The delivery of care can occur through face-to-face visits and telephone contacts and other means as appropriate.

### Patient-Centered

While the quality of care is uniform, care may be customized according to patient needs and values. Health professionals have the capability and responsibility to respond to individual patient choices, preferences and needs.

### Informed Choices

The patient has a significant role in determining the course of his or her care. Health professionals should be able to accommodate differences in patient preferences and encourage shared decision making.

### Communication

Physicians and staff work diligently to fulfill the organization's commitment to sharing knowledge and information with patients. Health professionals should support patients' access to their own medical, clinical and other relevant information. Health professionals should communicate effectively, ensuring that patients have adequate information to make informed decisions.

### Evidence-Based Care

Decisions regarding care are evidence-based. Health professionals should provide care based on the best available scientific standardized knowledge.

### Safety

At Princeton HealthCare System, safety is a top priority at all times. Health professionals should strive to enhance safety by continuously paying close attention to procedural and operational systems and by following policies and procedures that help prevent and mitigate errors.

### Service

Patients' needs should be anticipated whenever possible. Health professionals should do their best to anticipate patient needs through listening to patients and their representatives and monitoring patient conditions.

### Efficiency

Health professionals should make efforts to eliminate wasting of resources, patient time, or other valuable commodities.

### Teamwork

Cooperation among clinicians is a priority. Health professionals should actively collaborate and communicate to ensure an appropriate exchange of information and coordination of care.

### Respect and Compassion

Health professionals should deliver care with respect and compassion.

## Code of Ethical Conduct

### Our Organizational Structure for Compliance

#### Board of Trustees

The Board of Trustees recommends values to guide our behavior and instills a clear vision of integrity throughout the organization.

#### Chief Compliance Officer

The Chief Compliance Officer (CCO) has overall responsibility for the PHCS Corporate Compliance Program. The CCO is a member of the management team with direct access to the President and CEO and the Audit Committee of the Board of Trustees.

#### Corporate Compliance Program

The PHCS Corporate Compliance Program includes the following elements:

- A Corporate Compliance Committee that advises and assists the CCO.
- Establishing and maintaining the *Code of Ethical Conduct*.
- Developing and enforcing compliance policies.
- Creating training programs on compliance and ethical decision-making for all employees.
- Maintaining a confidential disclosure program that includes a compliance hotline and reviewing problem areas identified by employees.
- Prohibiting hiring or doing business with persons or entities that have been excluded from participation in Federal and State health care programs.
- Establishing auditing and monitoring mechanisms to ensure compliance.
- Responding to violations and preventing future occurrences.

Anyone with compliance-related questions or concerns is invited to contact the Chief Compliance Officer at 609.853.7140.

#### PHCS Compliance Hotline – 1.800.779.4035

The PHCS Compliance Hotline is another way to raise compliance issues or concerns. PHCS contracts with an outside company for hotline services. Calls are not recorded or traced, and callers may remain anonymous.



# Code of Ethical Conduct

## Quality of Care & Services

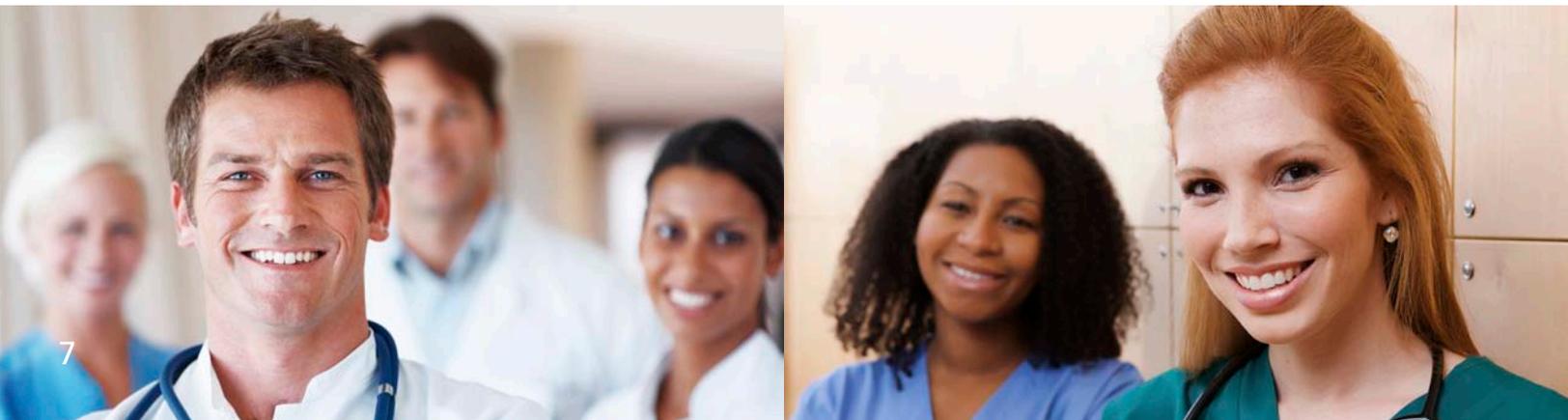
**I am committed to providing high quality care and services. My first responsibility is to PHCS patients.**

### **I can make this happen by:**

- Treating patients with dignity, respect, compassion and honesty at all times.
- Learning the needs and requirements of individual patients and doing whatever is reasonably necessary to provide quality care and services.
- Involving patients in decisions about medical treatment and other services according to each person's individual needs.
- Responding to all patient questions, concerns and needs quickly and sensitively.
- Providing care and services based on the most up-to-date standards of practice.
- Holding up-to-date professional licenses and credentials to ensure that I always provide proper care for our patients.
- Never discriminating against any patient or colleague regardless of race, color, religion, disability, ancestry, national origin, gender, sexual preference or age.
- Keeping all personal patient information confidential.
- Following all relevant laws and standards about patient rights.
- Reporting any poor quality care or services immediately to my supervisor or other manager.

### **To be sure, I can ask myself...**

- Do I always treat patients with dignity, respect, compassion and honesty?
- Do I report poor quality care or services to my supervisor or another appropriate person?
- Am I careful not to discuss patient information inappropriately or leave files in places where the public could see them?
- Are my professional licenses and credentials up-to-date?
- Do I know and understand the law about patient rights?
- Do I take the time to find out the needs and preferences of each patient I work with?



# Code of Ethical Conduct

## Regulatory Compliance

**I maintain high standards of business and professional ethics and integrity. When I provide services and conduct business, I follow all applicable laws, regulations and policies.**

### **I can help ensure compliance by:**

- Promptly reporting any possible violations to my supervisor or other manager, the Chief Compliance Officer or the PHCS Compliance Hotline, knowing that management will act on compliance issues and concerns fairly and truthfully.
- Not retaliating or taking any kind of negative action against any employee who reports a suspected violation in good faith.
- Becoming familiar with the laws, regulations and policies that govern my work area, such as EMTALA, HIPAA, the False Claims Act or patient referral rules (the “Stark” laws).
- Obeying all laws and regulations regarding billing of payers and patients.
- Refusing to offer kickbacks, bribes, rebates or anything else of value in order to obtain referrals.
- Obtaining all contracts and agreements with potential referral sources in writing, and obtaining the necessary approvals from management and legal counsel.
- Ensuring that all marketing information, both verbal and written, is clear, correct and accurate.
- Maintaining complete and accurate patient records and keeping all such information confidential.
- Ensuring that confidential patient information is accessible only by health care personnel involved in the patient’s care, payers and other authorized parties.
- Not hiring or contracting with anyone who is barred from Federal or State healthcare or procurement programs.
- Obtaining and maintaining proper professional licensing and training before I provide patient care.
- Ensuring that employees who provide patient medical services are properly licensed and trained.
- Following all laws regarding storing, dispensing and transporting drugs and other controlled substances used in treatment.

### **To be sure, I can ask myself....**

- Do I complete paperwork promptly and accurately?
- If I am concerned that a situation might not be in compliance with the law or PHCS policies and procedures, have I talked to my supervisor or other appropriate person?
- Do I understand and follow all the laws, regulations and policies that affect my area of responsibility?
- Do I take all reasonable steps to protect patient privacy?
- If a fellow employee has reported a suspected violation, am I continuing to treat that person fairly and with full support?

# Code of Ethical Conduct

## Human Resources

**Employees are the most valuable assets at PHCS. I treat my colleagues and fellow employees with respect and fairness. In doing my job, I take responsibility for meeting or exceeding job expectations.**

### **We can support each other by:**

- Treating everyone with dignity and respect and showing consideration for fellow employees, regardless of status or position.
- Respecting and rewarding excellence, leadership and exceptional contribution.
- Creating an atmosphere that is free from harassment and intimidation of any kind, verbal or physical, including sexual harassment.
- Reviewing how the employees who report to us do their jobs and providing them with objective evaluations in a consistent, uniform format at regular intervals.
- Striving to build each other's confidence and professionalism.
- Maintaining open lines of communication and respecting each other's views.
- Understanding that the *Code of Ethical Conduct* and personnel policies apply equally to all of us regardless of position in the workplace.
- Respecting the privacy of current and former employees regarding information contained in their personnel files.
- Hiring, training, promoting and compensating employees without regard for race, color, religion, disability, ancestry, national origin, gender, sexual preference or age.
- Providing reasonable training opportunities to help each other build and maintain professional skills.
- Encouraging each other to look at how we currently provide services and suggesting improvements.
- Reporting to a supervisor any practices or individuals that might compromise the health or safety of our workplace or that might violate safety standards.

### **To be sure, I can ask myself...**

- Do I always treat my colleagues and fellow employees with the same respect and dignity that I would like to receive?
- Have I done or said anything that might make a colleague or fellow employee feel powerless or unsafe?
- If I supervise others, do I give them regular feedback to help them do their jobs better? Am I fair and objective?
- Do I listen to my colleagues and fellow employees and consider their points of view?
- Am I positive and supportive in my relationships with all colleagues and fellow employees?
- If I believe a situation is unsafe, have I reported it immediately to my supervisor or other appropriate person?

# Code of Ethical Conduct

## Billing & Coding

**I am committed to fair, accurate and complete billing and documentation in accordance with all Federal and State laws.**

**If I am involved in billing or coding, I can help ensure integrity by:**

- Billing only for health care services that are medically necessary, actually provided and documented in the patient's medical records.
- Not knowingly submitting a claim that is false or fraudulent.
- Documenting all services I provide accurately and completely.
- Assigning diagnostic, procedural and billing codes that accurately reflect the services provided knowing that it is illegal to upcode, unbundle or use any other means to artificially increase reimbursement.
- Periodically reviewing coding policies and practices to ensure they are consistent with Federal, State and private payer health care program requirements.
- Becoming familiar with the laws, regulations and policies that govern my work area, such as the False Claims Act.
- Regularly reviewing our records for credit balances and promptly refunding overpayments.
- Not generally waiving or reducing insurance co-payments or deductibles.
- Maintaining all records in a secure location for the time period required by law. It is illegal to alter or destroy any document that a government agency or the court has requested or might request.
- Answering any questions related to a patient's bill honestly and directly.
- Promptly reporting to my supervisor or other manager, the Chief Compliance Officer or the PHCS Compliance Hotline any practices that might compromise the billing process or result in the submission of a false or fraudulent claim.

**To be sure, I can ask myself...**

- Before I bill for a service, do I have documentation that the service was provided?
- Did I complete my progress notes or update the patient's chart completely and accurately?
- Have I destroyed a document because I thought it might get PHCS or me in trouble?
- Do I follow policies that relate to collecting insurance co-payments and deductibles?
- Am I always honest when someone asks me about care or services that I have provided?



# Code of Ethical Conduct

## Property & Privacy

**I am committed to protecting PHCS property and information against loss, theft, destruction and misuse. I am also committed to protecting our patients' privacy and maintaining the security of their personal information.**

### **I can protect property and privacy by:**

- Not revealing or discussing protected health information except when it is necessary to facilitate care or payment of services. In any other situation, I will obtain proper authorization before sharing an individual's health information.
- Respecting each person's right to access his or her health information. Under the Health Insurance Portability and Accountability Act (HIPAA), patients have the right to:
  - Inspect and copy their health information;
  - Ask that we amend their health information;
  - Ask us to explain information disclosed in their health records;
  - Ask us not to disclose specific information in their health records;
  - Ask us to use alternative means for them to review their health information.
- Reporting any breach of patient privacy or confidentiality to a supervisor, the Privacy Officer, Chief Compliance Officer or the PHCS Compliance Hotline.
- Protecting the security of confidential patient or corporate information and using it only when necessary to perform my duties properly.
- Caring for, using correctly and protecting all property, cash and equipment entrusted to me.
- Maintaining and securing an inventory of all supplies and fixed assets.
- Disposing of surplus or obsolete property and equipment according to established procedures.
- Not making illegal copies of PHCS software and not running my personal software on PHCS computers.
- Keeping information and documents out of the hands of unauthorized persons.
- Using computers, e-mail, facsimile machines and other technology only to communicate with authorized people and never using it to send offensive, discriminatory or harassing messages.

### **To be sure, I can ask myself...**

- Have I followed HIPAA requirements before sending patient records to another health care provider?
- Have I discussed patient protected health information outside of my job duties?
- If a patient had a question about information in his or her health record, did I answer it or direct him or her to someone who could?
- Do I keep all patient and corporate information secure?
- Do I log off computers and applications when I am finished using them?
- Do I protect my computer usernames and passwords by not disclosing them?
- Do I know when it is appropriate to share PHCS policies and procedures with someone outside the organization?
- Do I put equipment away properly when I am finished using it?
- Have I limited making or receiving personal phone calls to ensure that it does not interfere with my job related responsibilities?
- Do I take work supplies home for personal use?

### Conflicts of Interest

**I will act in good faith in all aspects of my work. I will avoid conflicts of interest or the appearance of conflicts between my private interests and my work duties. A conflict of interest may exist whenever my decisions or actions benefit me, or my family, friends or business associates.**

#### **I can avoid conflicts of interest by:**

- Declining to offer, accept or provide gifts or favors, such as meals, transportation or entertainment that may create or appear to create a conflict of interest or a corrupting influence. (Meals incident to a business or professional purpose are acceptable when they do not violate any applicable law).
- Refusing any gift or gratuity that exceeds courtesy value and never accepting cash or cash equivalents in connection with my work at PHCS. (Non-cash items of courtesy value that are clearly tokens of business hospitality and do not create a conflict of interest may be acceptable).
- Maintaining unbiased relationships with actual and potential vendors and contractors.
- Exercising good faith and fair dealing in all transactions that involve my PHCS responsibilities.
- Using my position at PHCS only for the good of the organization, my patients and my fellow employees – not for my personal gain.
- Declining outside employment that conflict with my position at PHCS.
- Obtaining approval from my supervisor and area Vice President before hiring or having a business relationship that could benefit me, my family, or friends.
- Reporting actual or perceived conflicts to my supervisor, other manager, the Chief Compliance Officer or the PHCS Compliance Hotline.

#### **To be sure, I can ask myself...**

- Do I base my decisions on what is best for PHCS and the people we serve rather than on what is best for me?
- Has a vendor offered to take me and/or my colleagues out for a meal that may appear as a conflict of interest or a corrupting influence?
- Have I accepted a gift that a vendor's company representative paid for?
- If a patient offered me a gift that I couldn't share with my department, did I politely decline it? Did I accept a cash tip during the holidays?
- Before entering into any transaction for PHCS, do I stop to think how the transaction and its outcome will look to others? Does it appear to benefit me, my family or my friends?



# Code of Ethical Conduct

## Health & Safety

**I am committed to maintaining a work place that protects the health and safety of our patients and employees.**

### **I can protect health and safety by:**

- Complying with all safety and health requirements established by management, Federal, State or local laws, or our accrediting organizations.
- Taking all reasonable precautions and following all safety rules and regulations to maintain a safe environment for our patients, employees, and visitors.
- Reporting any safety or health violations immediately to the appropriate supervisor, Safety Officer, Chief Compliance Officer, PHCS Compliance Hotline or Safety Hotline.
- Maintaining an environment that is free from violence.
- Following all laws and regulations when disposing of medical waste and hazardous material.
- Reporting promptly to a supervisor or the Safety Officer whenever a patient, employee, or visitor is injured.
- Reporting all spills or accidents involving medical waste or hazardous materials to a supervisor and acting right away to help prevent harm.
- Participating in work place health and safety training to reduce hazards to myself and to my fellow employees.
- Inspecting any work areas under my supervision for health and safety risks, eliminating or reporting risks to management, being familiar with health and safety procedures, and training employees I supervise in health and safety precautions.
- Obeying all laws and PHCS policies regarding the sale, possession, distribution or use of illegal drugs or alcohol at work. Never reporting to work while under the influence of illegal drugs or alcohol.
- Storing, securing and counting all drugs and pharmaceuticals and promptly reporting any missing drugs to my supervisor.

### **To be sure, I can ask myself...**

- Do I follow required safety procedures, such as double-checking before administering medication?
- Am I familiar with the Joint Commission and OSHA regulations that apply to my work area?
- Do I always put disposable materials used in patient care in the proper receptacle or do I just throw them into the nearest trashcan?
- If someone slips and falls, do I complete an Incident Report and report the accident to a supervisor?
- Am I up-to-date on my safety training?
- If I see a situation or condition that could lead to someone getting hurt, do I act promptly to correct it or report it to a supervisor?

# Code of Ethical Conduct

## When in Doubt

### Warning Signs and a Quick Quiz

Sometimes you may not be sure whether an activity or situation is unethical or illegal. If you are in doubt, pursue your concern until you are confident that it is resolved, or that the right person at PHCS knows the facts and has taken action. A delay on your part could be serious for you, for others, and for PHCS.

### Warning Signs

Sometimes words and phrases can raise “red flags” about potential problems. Consider these warning signs:

- “Well, maybe just this once.”
- “Everyone does it.”
- “No one will ever know.”
- “Shred that document – no problem.”
- “No one will get hurt.”

### A Quick Quiz

If you hear, or begin to make, comments like these, ask yourself a few questions. The answers can help determine what you should do next.

- “Does this break a law, regulation, policy or the *Code of Ethical Conduct*?”
- “How will I feel about myself afterwards?”
- “What would my family, friends, PHCS patients or other employees think?”
- “How would this look if it were in the newspaper tomorrow?”
- “Am I being fair and honest?”

If you are not comfortable with any of your answers to these questions, or if you are still not sure whether an activity is wrong, contact your supervisor or other manager. The four-step communication and reporting process outlined in the next section should be a helpful guide.



## Code of Ethical Conduct

### Four-Step Communication & Reporting Process

If you have a question or concern about whether an activity is unethical, illegal, or wrong, use the following process to report concerns:

1. Talk to your supervisor. He or she is most familiar with the laws, regulations, and policies that relate to your work.
2. If you are not comfortable contacting your supervisor, or if you don't receive an adequate response, talk to another manager. Remember, all supervisors have an open door policy regarding compliance issues. You may also speak with someone from Human Resources.
3. If you have followed #1 or #2 and still have questions, contact the Chief Compliance Officer at 609.853.7140 or the PHCS Compliance Hotline at 1.800.779.4035. If you do give your name, your identity will be protected (except if disclosure is required by law). No disciplinary action or retaliation will be taken against you for reporting a compliance issue in good faith.
4. If for any reason you feel you cannot follow these steps, and want to remain anonymous, you can call the PHCS Compliance Hotline at 1.800.779.4035. An outside company will refer your report to the PHCS Chief Compliance Officer for appropriate action.



## Code of Ethical Conduct

### PHCS Compliance Hotline 1.800.779.4035

We understand that you can't always address questions or problems through the normal process. When this happens, you should use the PHCS Compliance Hotline. We have hired an outside company to take Hotline calls, so you can remain anonymous. The Hotline operators are trained to help you resolve questions and report concerns. You can reach the Hotline at 1.800.779.4035.

Calls to the Hotline will not be traced or recorded and you may remain anonymous. If you do give your name, your identity will be protected to the extent allowed by law. No disciplinary action or retaliation will be taken against you for calling the Hotline.

The PHCS Chief Compliance Officer will review all Hotline calls and will investigate them carefully and fairly before taking any action. PHCS respects and protects the rights of all employees, including anyone who is the subject of a Hotline call. Compliance actions will not be made public.

### Non-Retaliation Policy

PHCS will not take disciplinary action or retaliate against you when you report an issue, problem, concern, or violation to management, Human Resources, Corporate Compliance, or the PHCS Compliance Hotline **“in good faith.” “In good faith” means an employee reasonably believes the information reported is true.** We value and respect each person's dignity. You have the right to be treated fairly and with respect and PHCS will make sure that you are treated that way.

# Code of Ethical Conduct

## Our Responsibilities

### Employees and Colleagues

We expect everyone who works at or is affiliated with PHCS to follow the *Code of Ethical Conduct*, as well as all laws, regulations and policies. Anyone who knows about a violation must immediately report this information. If you do not report a violation, you may be subject to disciplinary action even if you were not directly involved. Reporting does not protect you from disciplinary action regarding your own performance or conduct.

### Supervisors and Managers

Supervisors and managers must demonstrate and promote a commitment to ethical and legal behavior consistent with PHCS's mission and values. As a leader, you have the obligation to ensure that employees or colleagues under your supervision:

- Know about, understand and follow all laws, regulations, and policies within the scope of their responsibilities;
- Know the procedure for reporting suspected or actual violations; and
- Are encouraged to ask questions and to report actual or suspected violations.

If an employee or colleague comes to you with a question about compliance with a law, regulation, or policy, you are responsible for:

- Taking steps to ensure the individual does not fear or experience retaliation;
- Maintaining the individual's confidentiality;
- Collecting accurate information regarding the individual's report;
- Following through to ensure that reports of violations or suspected violations can be investigated; and
- Informing the individual that you have followed through on his or her report.

## Certification and Acknowledgement

I have received and have read the PHCS *Code of Ethical Conduct*. I understand that following all laws, regulations, policies and the *Code of Ethical Conduct* is a condition of my employment or continued affiliation with PHCS. I understand I may seek advice at any time from my supervisor, any other manager, Human Resources, the Chief Compliance Officer or call the Compliance Hotline for any compliance questions or issues.

My completion of the on-line training reflects I acknowledge and agree that it is my responsibility to read the *Code of Ethical Conduct* and comply with the standards.

