



WEST VIRGINIA SCHOOL OF OSTEOPATHIC MEDICINE CODE OF CONDUCT

The professional conduct of those acting on behalf of the West Virginia School of Osteopathic Medicine (“WVSOM”) is critical to the fulfillment of WVSOM’s mission, vision, and values. The Code of Conduct for WVSOM sets forth expectations for ethical conduct by the WVSOM Board of Governors, administration, employees, and individuals employed by WVSOM using its resources or facilities, or volunteers and representatives acting as agents of WVSOM (“WVSOM Community”) and serves as a guide to everyday situations which may arise.

Why Does the Code of Conduct Exist

- To establish guidelines for ethical and professional conduct
- To help make decisions in our daily work
- To demonstrate we take compliance with federal, state, and local laws and regulations, as well as institutional policies and procedures, seriously
- To reflect who we are and what is important to us

Who is Expected to Follow the Code of Conduct

- All the WVSOM Community regardless of position, rank, or status

What Does the WVSOM Community Need to Know

- Know and comply with applicable laws relating to individual job responsibilities and all WVSOM policies and procedures
- Ask questions when unsure of the right course of action
- Speak up when misconduct is seen or suspected

If you encounter an issue about which you are not sure, ask yourself

- Does it reflect our values?
- Is it good for WVSOM and my coworkers?
- Would I feel okay if everyone knew about it?
- If you can answer “YES” to all of these questions, it’s probably safe to move forward
- But a “NO” or “NOT SURE” to any of them should cause you to stop and consider
- It is always appropriate-in any situation, under any circumstances-to ask for help

Leaders and Supervisors Set the Tone

- Set high expectations and lead by example
- Foster an open-door culture where the WVSOM Community feels comfortable asking questions and reporting concerns
- Promote ethics and compliance through discussion and learning opportunities



RESPECT AND CIVILITY

The WVSOM Community is entitled to work in an environment that is free of harassment, bullying, retaliation, and discrimination. When interacting with others, the WVSOM Community is expected to:

- Treat others the way you want to be treated
- Listen and interact with others and be receptive to different points of view
- Speak candidly and truthfully
- Promote an environment free of harassment, bullying, and abusive conduct-whether physical, verbal, or visual
- Promote conflict resolution
- Respect the decisions that have been made in the best interests of WVSOM
- Respect the property of WVSOM and others, whether material or intangible

ACCOUNTABILITY

The WVSOM Community has an obligation to act with integrity, honesty, transparency, and objectivity, treat others with respect, adhere to legal and regulatory requirements and uphold moral and ethical standards when making decisions on behalf of WVSOM. The WVSOM Community is expected to:

- Protect and maintain the confidentiality and privacy of personal and institutional information
- Exhibit conduct that promotes a safe environment
- Seek help as needed and take responsibility for their actions
- Be engaged and productive while contributing to collective successes
- Ensure personal relationships do not interfere with the performance of work or the management of human or financial resources
- Avoid individual or institutional conflicts of interest and promptly disclose real or potential conflict of interest to your supervisor or the Office of Compliance Services
- Report for work fit for duty, free from all substances that impair the ability to perform job duties in a safe, secure, productive, and effective manner
- Refrain from taking unfair advantage of another person through harassment, manipulation, abuse of privileged information, misrepresentation of material facts, or any other unfair practice
- Protect and properly use WVSOM's assets, property, information, facilities and equipment
- Act in a reliable and dependable manner



ETHICAL STANDARDS, INTEGRITY AND COMPLIANCE WITH LAWS, RULES, REGULATIONS

Ethical conduct is a fundamental expectation for the WVSOM Community. Obeying the law, in letter and in spirit, is the foundation on which WVSOM's ethical standards are built.

In practicing and modeling ethical conduct, the WVSOM Community is expected to:

- Act according to the highest ethical and professional standards of conduct
- Be personally accountable for individual actions
- Conscientiously fulfill obligations and perform duties as part of the WVSOM Community
- Communicate ethical standards of conduct through instruction and example
- Maintain an ongoing dedication to honesty, responsibility, and trustworthiness
- Condone no form of dishonesty, such as fraud, theft, cheating, or plagiarism
- Be good stewards of WVSOM resources which are reserved for business purposes on behalf of WVSOM and are not used for personal gain
- Maintain confidentiality by protecting the integrity and security of WVSOM information
- Report, inquire, or seek guidance, in good faith, suspected violations of the Code of Conduct, laws, regulations, or WVSOM policy

ANTI-RETALIATION STANDARD

WVSOM does not tolerate retaliatory action of any kind against anyone for reporting or inquiring, in good faith, about potential violations of the Code of Conduct, laws, regulations, or WVSOM policy or for seeking guidance with respect to suspected violations. Retaliatory actions include, but are not limited to:

- verbal or non-verbal hostility
- exclusion
- undue criticism
- any behavior that could discourage individuals from exercising their rights
- adverse action against any employee regarding the terms and conditions of employment (such as termination, demotion, or suspension) or threats related to such actions

WVSOM will strictly enforce this prohibition.

An employee who has engaged in conduct or performance that warrants disciplinary action or other employment consequences will not be insulated from the consequences of those actions because he or she had made a report of wrongdoing, as long as such disciplinary action is not taken because of the allegation of wrongdoing. Reports that are knowingly false, made with reckless disregard for, or in willful ignorance of facts that would tend to disprove the allegation, are not good-faith reports, are prohibited and may subject the reporter to disciplinary action.



ACCOUNTABILITY FOR VIOLATIONS

If it is determined, after appropriate investigation, that this Code has been violated, including (without limitation) by failure to report a violation or by withholding information relating to a violation, the offender may be disciplined, with penalties up to and including removal from office or termination of employment. Violations of this Code may also constitute violations of law and may result in criminal and/or civil liability for the offender and WVSOM. The WVSOM Community is required to cooperate with internal investigations of possible misconduct.

REPORTING KNOWN OR SUSPECTED VIOLATIONS

The WVSOM Community shall contact the WVSOM Compliance Services Office via email at complianceservices@osteو.wvsom.edu or contact the Ethics and Compliance Hotline to:

- Report known or suspected violations of this Code of Conduct, laws, regulations, or policies;
- Seek appropriate guidance when faced with ethical dilemmas, observed or suspected violations of this Code, any law, or WVSOM policy.

GUIDANCE

The WVSOM Community must work together to ensure prompt and consistent enforcement of this Code of Conduct. In some situations, it may be difficult to know if a violation has occurred. Because it is impossible to anticipate or address every situation that may arise, it is important to be able to approach a new questions or problem with confidence. If you have questions or concerns concerning the applicability of this Code, the legality of your or others conduct, or do not find the information you are looking for, you should consult with your supervisor or the Office of Compliance Services.

Breach of this Code of Conduct, laws, regulation, and/or WVSOM Policies and Procedures, may give rise to disciplinary action up to, and including, dismissal.