

3.2 Discussion/Action Item

CODE OF CONDUCT

Sunny Cooper

Code of Conduct - November 2025 Release

CCHP has updated its Code of Conduct to remove reference to specific processes and focus more on ethical conduct and behavioral standards. Below and the following slides are summary of changes.

- 1) ***NEW*** - disclaimer that the Code of Conduct shall not be construed as a contract of employment and who it applies to.
- 2) ***NEW*** - Table of Contents
- 3) ***NEW*** Section Introduction and Purpose - Definition of Ethics and what it is, Questions to ask yourself when faced with a challenging situation
- 4) ***NEW*** Section on Business Practices – expanded Conflicts of Interest, gifts and Tips, FWA, description of applicable laws (false claims act, stark law, anti-kickback law, etc.)
- 5) ***NEW*** Section on Privacy, Security, and Protection of Assets – Information Security and Data Protection, Responsible use of AI
- 6) ***NEW*** Section on Public Engagement – Media and Speaking Engagements, Reference to Social Media Policy, Political Activity
- 7) ***NEW*** Section on Workplace Environment – Drug and smoke-free workplace, emergency plan, no discrimination, bullying, harassment, or violence, no solicitation

Public Comments

JCC Comments