CODE OF CONDUCT

Core Values and Compliance

Treating and Serving the Pacific

*With Character*

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UCERA

University Clinical, Education & Research Associates

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Message from CEO and Board Chairman

Mission and Vision

In this Code of Conduct, we remind ourselves that UCERA is the primary means by which the John A. Burns School of Medicine (JABSOM) fulfills its mission of delivering high-quality healthcare, providing for the clinical education of future healthcare professionals, establishing community partnerships, and fostering interdisciplinary collaboration.

The unifying spirit of this code of conduct is that of “pono,” acting with forethought regarding right relationships, respect, and moral action. JABSOM, as part of the fabric of Hawaii, is a diverse learning community committed to excellence and leadership. The integrity central to “pono” means that we do the right thing, regardless of whether anyone is looking. Integrity builds the trust we need for accomplishments in the spirit of partnership, diversity and inclusion, respect for the entire human experience, excellence in all that we do, and the continuous learning among ourselves that leads to greater understanding and the application of new knowledge.

We seek sustainable ways to provide service to those in need by building compliant and efficient operations, being trustworthy in our business relationships, continuously looking to meet the needs of Hawaii whether it is in underserved areas, underrepresented specialties, or in ways that provide the means to support the greater mission.

We share JABSOM’s vision of Maika’i Loa, Attaining Lasting Optimal Health for All (ALOHA). Overall, we are blessed with the ability to provide service, to cure, to counsel, to support, to alleviate suffering. We help bring new life into the world, we help to sustain those lives, and we help at the end of days, whenever they may be. And, we are twice blessed that we can do all of these things while educating the next generation of physicians, with our knowledge, our skills, and in the values that we share.

Roy Magnusson, M.D. MS
Chief Executive Officer/Chief Medical Officer

Jerris R. Hedges, MD, MS, MMM
Chairman, UCERA Board of Directors and JABSOM Dean and Professor of Medicine
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Purpose of Code

At UCERA, we know that any success we build in our core areas of operation depends on our commitment to our core values. For over 17 years, UCERA has built credibility in the medical, academic and research communities by not only excelling in clinical, research and educational endeavors but also by consistently acting with integrity.

Accordingly, we designed this Code of Conduct so that a wide variety of individuals who work for or with UCERA understand the standards of behavior that we expect. While the Code of Conduct is intended to be comprehensive and easily understood, it is not meant to answer every question that may arise in your daily activities. It does, however, provide guidelines, direction and resources to help you carry out your UCERA duties. To the extent that any rules or policies are set forth in any other UCERA document or manual, those policies shall be consistent with this Code of Conduct.

Remember, the responsibility for lawful and ethical behavior is a personal one and no set of guidelines should ever eliminate your duty to exercise sound judgment and to act with integrity.

Core Values

Our mission is multi-dimensional as we strive to not only deliver high-quality healthcare services, but to also provide innovative clinical education for the next generation of healthcare professionals. Given our mission, we naturally share JABSOM’s vision of ALOHA:

- **Attaining**
- **Lasting**
- **Optimal**
- **Health** ..for
- **All**

We recognize that establishing core expectations helps us focus on our global mission and the achievement of ongoing goals. This Code of Conduct expresses our most fundamental expectations and core values:

Collaboration: Shared accomplishments in the spirit of partnership
Diversity and Inclusion: Respect for the entire spectrum of human experience
Excellence: Guiding all of our efforts in research, education, and service, especially with regard to patient safety and quality of care.
Innovation and Discovery: The generation, application, and transmission of new knowledge
Pono: Integrity, morality, and equity, taking action to eliminate health disparities in the spirit of social justice

Key Responsibilities

The Code of Conduct applies to all our employees. However, UCERA’s ability to carry out its mission depends upon a collaborative effort with associates (e.g. physicians, medical students, directors, contractors) who may not be UCERA employees but whose ethical and business conduct reflects directly upon UCERA’s reputation in the community. In the spirit of partnership, we share our Code with them. We expect our associates to aspire to a high ethical standard and to be aware of UCERA’s Code of Conduct for our organization.

Employees

UCERA employees are expected to embrace ethical standards as an essential element of their responsibilities.

Every employee is required to:

• Read and abide by this Code of Conduct
• Be familiar with, understand and observe the basic legal, regulatory and other rules relevant to his or her duties
• Respect the confidentiality of patient-related information
• Adhere to the highest ethical standards when acting on behalf of UCERA
• Respect the cultural values and religious beliefs of patients and family members, co-workers, staff members and visitors
• Prevent and refrain from discrimination or harassment of any kind, including racial, ethnic or sexual harassment
• Collaborate with UCERA senior management to proactively identify and manage potential conflicts of interest
• Contact the UCERA Chief Compliance Officer when behaviors of concern within the organization are identified

Integrity Check: Tips for Handling Questions and Concerns

Integrity, common sense, and sound judgment are critical in determining whether your personal behavior satisfies UCERA’s expectations for ethical and lawful behavior.
However, if you find yourself in a situation where you are unsure, take the Integrity Check by asking yourself the following questions:

**Integrity Check √**

- Is my action consistent with UCERA’s expectations as expressed in the Code of Conduct, other documents, policies or procedures?

- Could my action give the appearance of impropriety or wrongdoing?

- Could the action bring discredit to any employee or to UCERA or JABSOM if disclosed to the general public?

- Could I defend the action to my supervisor, other employees, to the UCERA Chief Compliance Officer or to the general public?

- Would I be comfortable if the proposed activity would be published in the newspaper?

- Is this activity something I could comfortably explain to my family?

These questions are designed to help you understand whether you feel good about what you are doing. If you remain unsure of what to do, you must seek guidance from your supervisor, UCERA Chief Compliance Officer or by contacting the UCERA Hotline.

**UCERA Hotline: (877) 469-4943**

Remember, if you have questions or concerns, or just need help, the UCERA Hotline is a great resource for getting help and reporting potential problems.

**Leadership Responsibility for Compliance Communication**

We expect more of those UCERA employees who serve in a senior management or supervisory role. You are responsible for reading and understanding documents central to our corporate compliance and ethics program, including this Code of Conduct and the Corporate Compliance Plan. We encourage all employees to approach their supervisors with compliance and ethical questions and therefore need you to understand UCERA’s expectations so that you can lead by example and when asked, effectively explain and communicate those standards to employees. We also expect you to take appropriate measures to help detect and correct any potential violations of law or policy and to prevent recurrence. UCERA leadership is also expected to stay informed about important ethical and compliance developments so that you can inform employees of relevant issues.
In sum, leadership personnel are expected to create and maintain an open environment where employees are encouraged and comfortable raising compliance concerns or asking questions. Adherence to the Code of Conduct and support of the Corporate Compliance Program will be components of the evaluation process for all employees including supervisory and management staff.

Compliance Standards

Organizational Ethics and Quality of Care
We recognize our ethical and moral obligation to the patients and community we serve. We treat all patients with respect and dignity and provide a single standard level of care that is both necessary and appropriate and in accordance with federal, state and city laws and regulations. We make no distinction in the care we provide based on race, color, religion, national origin, ethnicity, age, sexual orientation, disability, marital status or veteran’s status.

Confidentiality
We are committed to maintaining the confidentiality of all proprietary information according to existing laws and standards.

Patient Confidentiality and Privacy
We strive to avoid any unwarranted invasion or disclosure of patients’ privacy. We collect information about a patient’s medical condition, history, medication and family illnesses to provide the highest quality of care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality.

We are committed to complying with all applicable privacy and security laws and regulations, including the federal Health Insurance Portability and Accountability Act (HIPAA).

Employee Privacy
UCERA respects the privacy and dignity of all our staff. UCERA collects and retains employee personal information that is required for the effective operation of UCERA or that is required by law. UCERA protects and limits access to employee personal information and complies with applicable laws that govern employee privacy. Employees are prohibited from accessing or otherwise using employees’ records or information unless authorized to do so for legitimate business purposes.

Conducting UCERA Business
We conduct our business in accordance with laws and regulations and act in a manner that is in the best interest of UCERA and the mission it serves.
Oversight of UCERA Assets
Managers are responsible for establishing appropriate internal controls to safeguard UCERA assets, ensure the accuracy of financial records and reports, and maintain accurate reporting of all transactions. The integrity of UCERA’s financial records is critical to effective business operations and is a key factor in maintaining the confidence and trust of employees, patients and other stakeholders.

Accuracy, Retention and Disposal of Documents and Records
All employees are responsible for the integrity and accuracy of our business documents and records in order to comply with regulatory and legal requirements, as well as to ensure that records are available to defend our business practices and actions. No one may alter or falsify information on any record or document. Medical and business records must be fully and accurately completed and maintained, and consistent with proper business practices. UCERA takes necessary measures, including the assessment of new hardware and software, to ensure the accuracy and functionality of appropriate computerized and automated information systems. Employees must comply with UCERA’s record retention policies.

Anti-Kickback and Referrals Laws
Federal and state laws regulate kickbacks, bribes, rebates and other things of value designed to induce the purchase, recommendation to purchase, reduction or limitation of services, or referral of any kind of health care goods and services or items reimbursed by federal healthcare programs, including the Medicare and the Medicaid programs. UCERA closely monitors these laws and strives to structure arrangements to promote compliance with these laws.

Referrals
UCERA does not pay for referrals. We accept referrals based solely on patients’ clinical needs and our ability to render necessary services. No employee or any other individual acting on behalf of UCERA is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. UCERA is committed to ensuring that UCERA physicians understand their responsibilities in this arena and make appropriate referrals in accordance with applicable federal and state laws, including the federal Stark laws.

Restrictions for Government Personnel
Employees may not provide or pay for meals, refreshments, travel or lodging expenses for government employees, offer any type of gratuity under any circumstances or entertain a public official without authorization from the Chief Executive Officer.

Personal Use of UCERA Resources
UCERA’s assets, which include employees’ time, materials, supplies, equipment and information, are to be used and maintained primarily for business-related purposes. Employees may not use these resources in a manner that could be harmful or
embarrassing to UCERA. Any use of UCERA resources for personal financial gain unrelated to UCERA is prohibited.

Copyright
Employees are prohibited from reproducing any copyrighted materials without the express permission of the copyright holder unless the doctrine of fair use is applicable. Employees are required to adhere to laws and policies relating to intellectual property, including patents, trademarks and copyrights.

Electronic Media
All communications systems, electronic mail, Internet access or voice mails are the property of UCERA and are to be primarily used for business purposes. Limited responsible personal use of communications systems is permitted; however, UCERA reserves the right to monitor the use of its electronic media resources and to take appropriate disciplinary measures in cases of misuse. Patient or confidential information shall not be sent through the Internet unless safeguarded according to UCERA policy.

Third Party Payer Relationships

Billing, Coding and Reimbursement
UCERA is committed to pursuing compliance with laws and regulations relating to billing, coding and reimbursement. This commitment applies to public and private healthcare programs alike. UCERA operates oversight systems to verify that claims are submitted only for services actually provided, and services are billed as provided. We will strive to ensure that billings to governmental and third-party payers are accurate and documented to reflect the items and services provided. Employees are prohibited from knowingly presenting or causing to be presented claims for payment or approval, which are false, fictitious or fraudulent. Employees are further prohibited from knowingly retaining overpayments to which UCERA is not entitled. They are expected to participate in training programs designed by UCERA to explain the billing, coding and claim submission process.

Strict compliance with all relevant Medicare and Medicaid laws and regulations is required of all employees. UCERA does not routinely waive patients’ deductibles or copayments or otherwise provide for financial benefits to patients in return for admission.

Any subcontractors engaged to perform billing or coding services on UCERA’s behalf are expected to have the necessary skills, quality control processes, systems and appropriate procedures to ensure billings for government and commercial insurance programs are complete and accurate. If mistakes or errors occur, such errors must be reported to a UCERA manager promptly and corrected in a timely and appropriate manner. If improper payment occurs, UCERA will utilize the appropriate process for reconciling the erroneous payment.
Documentation
A key factor in accurate billing is assuring that the diagnosis and treatment of a patient are timely, accurately, and completely documented. In addition to facilitating high quality patient care, a properly documented medical record verifies the services that were provided. All medical records must be legible, complete, and accurate. Individual departments are responsible for implementing appropriate documentation guidelines.

Workplace Conduct and Practices

General
As an organization, UCERA recognizes that our employees are our greatest assets. UCERA is committed to providing an employment setting that treats all staff with fairness, dignity and respect, and affords them an opportunity to grow, to develop professionally and to work in a team environment.

It is UCERA’s policy to:
• Provide equal opportunity for employment and advancement on the basis of ability and aptitude
• Protect the health and safety of employees
• Compensate employees fairly and equitably
• Train employees adequately relative to their job responsibilities

Employees are encouraged to develop their individual skills and understanding of their jobs. The Human Resources Department maintains manuals of policies and procedures to implement these global goals. Familiarity and adherence to UCERA’s Human Resources policies are responsibilities of each employee.

Equal Employment Opportunity and Diversity
UCERA is committed to providing an equal opportunity work environment. We will comply with applicable laws, regulations and policies related to nondiscrimination and fair employment practices in all of our personnel actions. Such actions include hiring, placement, transfers, promotions, training, compensation, evaluations, leaves of absence, recruiting, corrective action, discipline and staff reductions. We make reasonable accommodations to the known physical and mental limitations of otherwise qualified staff with disabilities. Retaliation against individuals for raising claims of discrimination or harassment is prohibited.

Employment/Screening
UCERA verifies the credentials and qualifications of all individuals applying for employment and hires qualified individuals with appropriate expertise, licensure and experience.

We will not hire or contract with any individual or entity who is excluded, suspended, debarred or otherwise ineligible to participate in the federal health care programs.
or has been convicted of a criminal offense related to the provision of health care items or services and has not been reinstated in the federal health care programs after a period of exclusion, suspension, debarment or ineligibility.

**Harassment/Workplace Violence**
All employees have the right to work in an environment free of harassment. UCERA will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work at UCERA. Degrading or humiliating jokes, slurs, intimidation or other harassing conduct is not acceptable. Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment or other decisions, as well as other verbal or physical conduct that creates a hostile work environment. UCERA does not tolerate workplace violence, e.g. threatening, aggressive or abusive behavior. Moreover, as part of our commitment to a safe workplace, employees are prohibited from possessing firearms, other weapons or other dangerous instruments and materials on the premises of UCERA.

**Immigration**
Federal law prohibits UCERA from hiring individuals who are not legally authorized to work in this country.

**Employee Loyalty and Conflicts of Interest**

**Conflict of Interest**
In the course of conducting UCERA business, we are expected to put UCERA’s interests ahead of any outside business, commercial or personal interest. Employees should strive to avoid situations in which conflict of interest, or the appearance of a conflict, could potentially arise. A conflict of interest may also exist if the demands of your outside activities influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. Conflicts of interest may arise from time to time and a key to UCERA’s success is the ability to know about the potential conflict and to prudently manage such potential conflict. Accordingly, anyone who believes he or she has a conflict of interest or the appearance of a conflict of interest shall immediately report it to his or her supervisor, department manager, Chief Compliance Officer or Director of Human Resources. For additional guidance, please see UCERA’s Conflict of Interest policy.

**Outside or Dual Employment**
Employees’ primary obligation is to UCERA. Any activities, such as a second job or personal business, must not conflict with obligations to UCERA. Employees with secondary employment that may be perceived as a conflict of interest with their UCERA position must disclose the potential conflict to their supervisor, department manager, Chief Compliance Officer or Director of Human Resources.
Gifts and Entertainment/Business Courtesies
Gifts and entertainment represent an area of potential conflict in situations where a competitive, regulatory, supervisory or adversarial relationship could exist. Giving or accepting gifts and entertainment can sometimes be construed as an attempt to unduly influence a relationship.

It is UCERA’s policy that no personal gifts may be offered or received under circumstances in which the gift might possibly influence the exercise of proper business judgment, regardless of whether this was or was not the intent of the donor or recipient. Accordingly, one should not provide or accept gifts of more than nominal value. Gifts of money (including gift certificates) are never acceptable. Solicitation of personal gifts or entertainment is never permissible. Acceptance of a perishable or consumable gift (e.g., fruit baskets, cookies, flowers) of nominal value given to a department or group by a vendor during the holiday season or by a patient as a token of appreciation is permissible; however, such gifts should be shared with other staff.

There may be times when employees may wish to accept from a current or potential business associate an invitation to attend a social event, participate in training and educational opportunities or receive information about new products or services. Questions related to gifts and entertainment and business courtesies should be referred to the Chief Compliance Officer.

Political Activities and Contributions
As a tax–exempt entity, UCERA is prohibited from participating in political campaigns by law. UCERA funds or resources are not to be used to contribute to political campaigns or for gifts or payments to any political party or any of their affiliated organizations. UCERA resources include employees’ work time, telephones or computers. While employees are permitted to participate in the political process on their own time and at their own expense, they may not do so on behalf of UCERA. Further, employees are not permitted to use their positions at UCERA to further the political activity of any person or group. With the permission of the Board of Directors, UCERA resources may be used to hire a lobbyist to champion the mission, vision, and values of UCERA.

Senior management is responsible for developing UCERA’s position on relevant legislative and regulatory issues. If you are contacted by legislators or regulators regarding UCERA’s position on public issues, you should refer them to the Chief Compliance Officer.

Promotion of Products
It is a violation of UCERA policy for employees to endorse commercial products using UCERA’s name without the prior approval of UCERA. Payment for endorsement is not permitted. Vendors are not permitted to market their products on UCERA premises without prior approval.
Clinical and Research Grants and Contracts Requirements
UCERA is committed to observing the highest ethical standards relating to clinical and research grants and contracts, and strives to promote compliance with all federal, state and local laws and regulations, as well as relevant UCERA policies and procedures.

Relationships with Suppliers, Vendors and Subcontractors
UCERA manages its relationships with suppliers, vendors and subcontractors in a fair and reasonable manner, consistent with applicable laws, good business practices, and in accordance with UCERA policies and procedures. Selection of suppliers, vendors and subcontractors will be made on the basis of objective criteria, including quality, service, price, delivery, technical excellence, adherence to schedules, and supply of goods and services. Purchasing decisions will be made on vendors’ ability to meet UCERA’s needs and not on personal relationships, friendship, favors, gratuities or contributions. Suppliers, vendors and subcontractors will be expected to abide by this Code of Conduct.

Health and Workplace Safety

Environmental Health and Safety
UCERA is committed to providing and maintaining a healthy, safe and secure environment for all patients, staff and visitors. We comply with applicable laws and regulations relating to the environment, including those relating to the handling, storage, use and disposal of pollutants, hazardous materials and infectious wastes that may be used or generated in the course of clinic operations. UCERA is dedicated to promoting the occupational health and safety of its staff. It is UCERA’s policy to provide and require the use of appropriate protective equipment and measures, and insist that all work be performed in a safe and responsible manner. Employees are required to become familiar with emergency and safety plans.

Employees must immediately report workplace injuries or unsafe conditions. No employee will be subject to retaliation or reprisal for being injured on the job or for reporting a workplace injury or unsafe situation.

Substance Abuse and Impairment
UCERA is committed to an alcohol- and drug-free workplace environment. Employees are expected to report for work free of the influence of alcohol and illegal substances. Working under the influence of any illegal drug or alcohol, using, possessing, or distributing illegal drugs while at work or on UCERA premises may result in immediate termination.

Prescription Drugs
UCERA is legally responsible for the proper distribution and handling of regulated pharmaceutical products, including prescription drugs, controlled substances, hypodermic needles and drug samples. All employees must be vigilant in complying with all applicable laws, regulations and UCERA procedures, maintaining the highest
professional standards in safeguarding pharmaceuticals of all kinds, and preventing unauthorized access to them. If you become aware of the diversion of drugs from UCERA, it should be reported immediately to your supervisor, the Chief Compliance Officer or to the Chief Executive Officer.

Getting Help and Other Important Procedures

While UCERA strives to avoid problematic conduct, issues arise and mistakes occur. This section of the Code of Conduct is designed to explain UCERA’s expectations regarding the reporting and resolution of potential problems as well as other expected behavior.

The Corporate Compliance Program
Corporate Compliance Program Structure and Your Responsibility

The Corporate Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of UCERA to the highest standards of integrity, ethics and compliance. The overall accountability for UCERA’s Corporate Compliance Program rests with the Board of Directors. The Board’s Corporate Compliance Committee serves in a leadership role for compliance matters and is comprised of representatives from various functional areas. The Chief Executive Officer, Chief Compliance Officer, and Human Resources Director provide accessible compliance guidance to employees and serve as first-level contacts for compliance questions, issues, and complaints.

Obligation to Report
Every employee has a responsibility and is required to report any activity by any colleague, physician, contractor or vendor that appears to violate applicable laws, rules, regulations or this Code of Conduct through the appropriate chain of command. Reporting enables the potential problem to be investigated promptly and addressed in a timely and appropriate manner.

What to Report
Report concerns about any legal, ethical, quality, behavioral or practical issue, or any activity that you think may be a problem. Pay particular attention to issues related to federal health care programs (i.e. Medicare and Medicaid). Reasonable belief that a violation is possible is sufficient to initiate a report. To help you determine whether an issue should be reported, consider the following questions:
• Does the matter comply with pertinent UCERA policies and procedures?
• Is the action legal? Is it ethical?
• How would the action appear if it were disclosed to the public?
Resources for Reporting Violations
Reports of suspected or actual violations can be made in person, by telephone or in writing. Employee reports should first be made, if possible, to the employee’s supervisor or department manager. Reports may also be made directly to the Chief Executive Officer, Chief Compliance Officer, or Human Resources Director.

Employee Protection (Whistleblower) Policy
UCERA will not retaliate against an employee who in good faith has made a protest or raised a complaint against some practice of UCERA, or of another individual or entity with whom UCERA has a business relationship, on the basis of a reasonable belief that the practice is in violation of law or a clear mandate of public policy. UCERA will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of UCERA that the employee reasonably believes is in violation of a law, rule, regulation or clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

Internal Investigations
UCERA is committed to investigating all reported concerns promptly and confidentially to the extent possible. We expect all employees to cooperate with internal investigational efforts.

Corrective Action
Where an internal investigation substantiates a reported violation, appropriate corrective measures will be taken, including, but not limited to, notifying the appropriate governmental agency, instituting appropriate disciplinary action and implementing systemic changes to prevent a similar violation from recurring. Corrective action plans will be shared with appropriate stakeholders.

Government Inquiries and Investigations
It is the policy of UCERA to cooperate with and properly respond to all governmental inquiries, audits and investigations. Any employee approached by any federal or state law enforcement or regulatory official seeking information about any aspect of our operations shall immediately notify their supervisor who in turn must notify UCERA’s In-House Counsel. It is UCERA’s policy to promote the effective resolution of any governmental inquiry.

Consequences of Noncompliance
Failure to comply with applicable laws and regulations, including federal health care program requirements, or with the requirements of this Code of Conduct or UCERA’s policies and procedures, or to report violations or suspected violations, could pose significant risks to UCERA, our employees, and the patients we serve. Examples of consequences to UCERA or employees for noncompliance include: exclusion from participation in federal health care programs, such as Medicare, as well as criminal and/or civil fines and penalties.
Disciplinary Action
Disciplinary action, up to and including termination, may be taken for:
• Violating this Code of Conduct
• Failing to report a violation of the Code of Conduct or cooperate in an investigation
• Retaliating against an individual for reporting a violation or possible violation of the Code of Conduct
• Deliberately making a false report of a violation of the Code of Conduct

Internal Monitoring and Auditing
UCERA is committed to an ongoing assessment process. Monitoring will be conducted to address UCERA’s compliance with laws, regulations and policies governing, among other things, coding, reimbursement, documentation, and other areas that may be deemed as high-risk areas.

Additional Resources
While this Code of Conduct provides overall general guidance, there are additional guidance resources with respect to our Corporate Compliance Program available to employees. These resources include UCERA-wide and department-specific policies and procedures, the Employee Handbook, as well as consultation with individuals within your chain of command, beginning with your immediate supervisor.
Appendix : Contact Information

UCERA Chief Executive Officer/Chief Medical Officer
Roy Magnusson, M.D. MS
Phone : (808) 469-4961
Email : rmagnusson@ucera.org

UCERA General Counsel /Chief Compliance Officer
Lauren Kwak, JD
Phone : (808) 469-4958
Email : lkwak@ucera.org

UCERA Director of Human Resources
Mercedes Lanza
Phone : (808) 469-4968
Email : mlanza@ucera.org
Employee Certification

I certify that I have received and read UCERA’s Code of Conduct and understand the requirements set forth in that document. I understand that I will be subject to disciplinary action, up to and including termination, for violating UCERA policies or failing to report violations of UCERA policies.

Name: ________________________________________________

(please print)

Signed: _______________________________________________

Date: _________________________________________________