



**NUMBER:** 1xx

**TITLE:** Code of Conduct

**POLICY DESCRIPTION:** This policy describes HFNC's Code of Conduct for industry representatives and employees.

**PURPOSE:** Along with the Conflict of Interest Policy, to outline the appropriate behavior of industry personnel and industry representatives associating, interacting or engaging with the community members and volunteers of HFNC at sponsored HFNC events. Industry personnel and representatives may act as volunteers or as attendees of HFNC events, but in all instances compliance with the Code of Conduct Policy is expected.

**FORMS USED:**

**PROTOCOL:**

The Hemophilia Foundation of Northern California (HFNC) has established the following Code of Conduct governing the behavior of all bleeding disorders industry representatives with regards to interaction with HFNC, its Board and/or its community members.

HFNC recognizes that relationships can be built between industry representatives and community members at events held by HFNC. Industry representatives can act as volunteers at events as well. As such, there must be clear guidelines for what are appropriate types of behaviors, communications and interactions.

The following guidelines establish the Code of Conduct to which all individuals must abide at HFNC.

1. HFNC events and activities are non-solicitation zones. Industry representatives may only represent and/or discuss their products and industry related materials in designated, approved areas (e.g. designated tables or booths) provided for by HFNC for specific events or activities.
2. Under no circumstances will HFNC provide confidential member information, including but not limited to names, addresses, phone numbers, social media profiles, email address, etc., to any company or industry individual. This does not include HFNC paid advertisements, nor independent inquiries resulting from paid HFNC advertisements.
3. If an industry representative or employee is acting as a volunteer to any HFNC event or activity, under no circumstances will he/she solicit, provide or keep any confidential information of community members as listed in Item 2.

4. At all HFNC events and activities, industry representatives agree to conduct themselves appropriately and ethically, within the confines of Item 1 above. Inappropriate behavior includes, but is not limited to, solicitation or exchange of personal contact information or social media information. Any activity or attempts to entice, request or suggest, whether directly or indirectly, a patient, family or caregiver to change a service provider or product while at HFNC events or activities will be considered a violation of this code of conduct.
1. At HFNC events, industry representatives will not distribute promotional items (e.g. items containing company logos, gifts, etc.) or informational products or brochures without prior approval or agreement from HFNC. All items containing company logos must be distributed through the Foundation (e.g. (e.g. at an approved booth or table, via an approved volunteer, etc.) and distribution is at the sole discretion of HFNC.
2. All industry representatives will comply at all times with the letter and spirit of federal laws as set forth by the Federal Trade Commission and the Office of the Inspector General regarding illegal marketing to children, and limits on gifts from industry to customers and potential customers.

## ENFORCEMENT

Any person found to be violating any part of the HFNC Code of Conduct outlined in this document will, at the first violation, receive a written notice, immediate removal from the event at which the offense occurred (if applicable), and a three year ban from all HFNC activities and events. Upon the second offense, the person will be immediately removed from the HFNC event (if applicable), and will be permanently excluded from all HFNC activities and events. If the person is an industry representative, that company may also be excluded as described above.

If an industry representative believes he or she has been wrongly accused of a violation, the individual may request that a committee be formed to hear all sides of the alleged violation. Any such appeal requests must be submitted in writing (e.g. email) to a member of the Standards and Policy Committee within 60 days of the enforcement action. The Standards and Policy Committee will designate a set of individuals from the HFNC Board to collect the necessary information to render a fair and just decision. All parties agree to abide by the decision with no further appeals allowed.