



Code of Conduct



Dear Colleagues,

The Salaam Clinic strives to uphold manners and characteristics of the highest standard. As we build our institution to fulfill our mission, we must build it on a foundation of honesty, integrity, patience, sincerity, and compassion. Not only will these values we hold near to us benefit our patients, but will also benefit the community around us. Living our values that are rooted deep in spiritual traditions will give birth to an unparalleled confidence in our institutions and in our services.

Our code of conduct is part of our larger compliance program. It states the ethical guidelines by which we operate our business, and can give a guiding light when faced with difficult and complex decisions. All Salaam Clinic volunteers, caregivers, administration, and others are required to abide by our code of conduct.

We are all responsible to abide by the highest of ethics, and we are all individually accountable for making sure Salaam Clinic remains a transparent and safe environment for both caregivers and patients.

- **Syed Shoaib Z. Sha, MD.**
- **Chief Executive Officer, Salaam Clinic**



Code of Conduct

PURPOSE

The code of conduct, as adopted by the organization, supplements the mission, vision, and values of the Salaam Clinic and is an integral part of our compliance program. The code of conduct provides guidance on carrying out daily activities in coordination with ethical and legal regulations, in addition to providing standards of conduct. The code of conduct does not intend to cover all situations and does not address ethics related to medical care.

Who must abide by the Code of Conduct?

All caregivers, directors, officers, volunteers, and service providers at all locations are required to observe this code of conduct, conduct in an ethical manner, and abide by any legal and compliance regulations. This includes all those who do business with, and on behalf of the Salaam Clinic - Cleveland Ibn Sina Clinic.

1. INTEGRITY IN PATIENT CARE

Patient Rights

Salaam Clinic strives towards a culture of continuous improvement in patient safety. As such, patient confidentiality is of utmost importance. Patient information, including photos, videos, and the like, is strictly forbidden from being shared to third parties or posted on social media without explicit consent and authorization of the patient or their representatives. Salaam Clinic - Cleveland Ibn Sina Clinic caregivers must abide by the clinic's privacy and security policies. Each patient is entitled to dignity, respect, and quality healthcare regardless of their race, creed, sexual or gender orientation.

Emergency Treatment

All those in request of emergency treatment at the Salaam Clinic will be given a screening exam, and attempted stabilization, before being transferred to the proper facility and the proper authorities called, in accordance with state and federal requirements and the Salaam Clinic policies.

Research

Salaam Clinic is committed to following ethical standards and guidelines set by federal and state laws and regulations in research, investigations, and clinical trials.

It is our priority to protect the rights of any subject. We will be transparent in all financial transactions regarding grants for research.

2. INTEGRITY IN BILLING AND FINANCIAL PRACTICES

Accurate Books and Accounts

Salaam Clinic is committed to the highest standards of ethics and integrity regarding accurate books and accounts. We require every caregiver to report information accurately and honestly, including time spent as a caregiver, incurred business expenses, revenue and costs, and other business related activities.



3. INTEGRITY IN WORKSPACE

Confidential Information

Salaam Clinic caregivers, volunteers and employees are obliged to maintain the confidentiality of information pertaining to patients' protected health information, personnel, and other proprietary information. Salaam Clinic - Cleveland Ibn Sina Clinic strictly forbids the sharing of patient or proprietary information with outside sources and holds absolute the highest ethical standards of patient confidentiality.

Intellectual Property

Salaam Clinic will abide by all intellectual property laws and respect the intellectual property and copyright of journals, books, or other applicable sources. All software must be properly licensed and used in accordance with that license.

Family and Work

Employment or placement in a volunteer capacity, of a first degree relative in which the caregiver has a direct administrative or supervisory responsibility over the relative is not permitted.

Appropriate Use of Resources

Volunteers, trustees, employees, and other caregivers all have a duty to maintain an appropriate use of resources. Inappropriate use or theft of resources is damaging to our organization. All information stored on Salaam Clinic computers and network systems, including email, are considered business information and may be suspect to review.

Professional Conduct

Salaam Clinic holds its caregivers to a high standard of professional conduct. Unprofessional conduct leads to

less collaboration and an unsafe environment for caregivers, which leads to an unsafe and less than optimal environment for patients. Under no circumstance will intimidation or harassment by any caregiver toward another be tolerated. Please report any instance of unprofessional conduct to the appropriate administrator or manager.

Drug Free Work Place

Salaam Clinic is strictly a recreational drug and alcohol free environment. Please report any suspicious behavior by any caregiver to the appropriate administrator.

Prohibition on Discrimination and Harassment

Salaam Clinic ensures an environment free from harassment or intimidation of any individual on the basis of race, color, religion, creed, sexual and gender orientation, citizenship, pregnancy, marital status, disability, military status, genetic information, or any other characteristic protected by state and federal law. Salaam Clinic policy also prohibits any retaliation or retaliatory attempts.

Gift Giving and Receiving

Caregivers are prohibited from soliciting tips, personal gratuities, or gifts from patients and vendors. Employees may, however, accept non-monetary gratuities or gifts of a nominal value, such as cookies, flowers or candy if the gift would not influence, or reasonably appear to others to be capable of influencing, the employee's business judgment in conducting affairs with the patient or vendor.

Political Activity

Salaam Clinic does not endorse, promote, participate, or intervene on behalf, or in opposition to, any political candidate. Although Salaam Clinic does not condone nor condemn its caretaker's participation in

the political process, Salaam Clinic may at times support certain issues as it pertains to business functions and in accordance with legal counsel. Caregivers of Salaam Clinic may not use their status with the organization, or speak on behalf of the organization, in support of, or in opposition to, any political candidate.

Marketing and Advertising

Marketing and Advertisements may be utilized in order to spread awareness of our services, to ask for support of our mission, and in order to recruit caregivers.

Media Relations

All requests to and from external media will be directed to the communications and marketing department. Caregivers should not release information to media or journalists without prior permission from the communications and marketing department.



4. LEGAL AND REGULATORY COMPLIANCE

Screening of Excluded Individuals

Salaam Clinic will not conduct business with, employ, or privilege any individual who has been debarred, excluded, or otherwise ineligible in participation of federal health care programs.

Adherence to Health and Safety Laws

All Salaam Clinic caregivers are expected to adhere to applicable health and safety laws.

Environmental Protection

Caregivers are to dispose of all waste and hazardous materials in accordance with applicable law and regulation. Cleveland Clinic expects caregivers to report known or suspected activity of this type to the Corporate Compliance Office. Caregivers who lawfully report false claims or other fraudulent conduct or who otherwise assist in an investigation, action or testimonies are protected from retaliation to the furthest extent possible under both federal and state laws.

Regulation of Controlled Substances

Salaam Clinic will follow applicable laws and regulatory governance involving medical supplies, prescription drugs, and other controlled substances. These will only be handled by authorized individuals. Only authorized individuals will be able to handle controlled substances.

Not-for-Profit Tax-Exempt Status

Salaam Clinic is a trade name under the not-for-profit 'Salaam Cleveland'. Salaam Cleveland is tax exempt due to its charitable nature. Salaam Cleveland uses its resources for further good in accordance with its mission, as opposed to the private or personal interest of any individual or entity.

Antitrust

Cleveland Clinic engages in activities that are subject to state and federal antitrust laws. Generally, these laws prohibit competitors from entering into agreements to fix prices or to reduce price competition. Cleveland Clinic caregivers should not provide information about Cleveland Clinic business to a competitor. In addition, caregivers are to refrain from engaging in unfair practices that might restrict competition.

Anti-Kickback/Bribes

It is strictly prohibited for any caregiver or volunteer or other service provider to partake in the taking of kickbacks or bribes of any nature for any reason. All contracts and negotiations are to follow any applicable laws and regulations as well as follow proper policy and procedure

Insider Trading

Any information gained through private business information is strictly forbidden for use in public trading.

Anti-Corruption Laws

Salaam Clinic caretakers and volunteers may not promise to provide anything of benefit to a foreign agent or government that may appear to be an attempt to secure improper advantage for business purposes.

Responding to Government Inquiries

Proper clinic policy must be followed in the response to any non-routine requests and inquiries from the local, state, or federal government. Consultation with the clinic's legal counsel must be received prior to responding in order to make sure the response is handled properly. All caretakers and other service providers are to be cooperative and truthful when dealing with all entities, and especially when dealing with government entities.

5. ETHICAL RESPONSIBILITY

Reporting Any Suspected or Actual Violations

All caregivers at the Salaam Clinic have a responsibility to report suspected or actual violations of the code of conduct to an administrator. Our anonymous reporting system is to be used as a supplement to the other lines of communication in regards to reporting suspected or actual violations.

Non-retaliation

There will be absolutely no retaliation or negative consequences for reporting violations of the code of conduct.

Management Responsibilities

Managers must take a lead role in applying the code of conduct. They must take action when ethical concerns are raised and use the proper policies and procedures to address the concern.



