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Policies and Procedures

SUBJECT: Code of Conduct
POLICY #: 803.1
PROCESS OWNER: Business Operations

RELEASE DATE: 02/17/2011
EFFECTIVE DATE: 08/27/2018
BOARD/COO APPROVAL:

PURPOSE / OVERVIEW / INTENT:

The Mind Research Network's (MRN) mission requires all employees of the organization to share a commitment to excellence in their work. Such standards can only be sustained if the actions of each employee, regardless of role, are beyond ethical reproach. Accordingly, each employee of MRN is expected to adhere to this "Code of Conduct" in their dealings inside and outside of the organization.

GUIDELINES / GENERAL RULES / POLICY:

Ethical conduct. MRN employees should conduct themselves ethically, honestly, and with integrity in all dealings. They need to be fair and principled in all of their interactions, whether business or research, and to act in good faith both inside and outside the MRN community. Employees should act with due recognition of their position of trust and with respect to the organization, their colleagues, research participants, sponsors, and donors. When in doubt about the propriety of a proposed course of action, they should seek counsel from those colleagues, supervisors, or administrators who can assist in determining the right and appropriate course.

Respect for others. MRN, as a diverse community in race, background, age, religion, and in many other ways, requires each employee to demonstrate respect for human dignity, privacy, and equality. Employees should be courteous, decent, and helpful. They are called to contribute to the success of others and demonstrate gratitude for the contributions from others.

Conflict of interest. MRN is committed to promoting objectivity in research and ensuring unbiased design, conduct, and reporting of research, including its significant portfolio of federally-funded projects. Ensuring such objectivity requires that MRN and MRN investigators work together to completely disclose potential conflicts of interest. As more fully stated in the MRN *Financial Conflict of Interest Policy*, significant financial interests that are related to the subject of the research or that could be affected by the research must be appropriately reviewed and appropriately managed or eliminated. Employees should be aware of potential for real and perceived conflicts of interest and/or commitment and they should be managed according to appropriate MRN policies and procedures.

Compliance with applicable laws and regulations. The MRN, as a research institute, operates in a highly regulated environment. Nearly every policy established by the organization draws its purpose from federal, state, and local laws and regulations applicable to a covered activity. Employees should be aware that noncompliance can have severe adverse financial and other consequences, which extend beyond their own individual circumstances, to potentially affect the reputation and operations of the entire organization. Accordingly, compliance is an important matter of principle and employees must comply rigorously with all rules and regulations that apply to the fulfillment of their responsibilities.

Compliance with contractual, grant, and other private obligations. In the course of its operations, MRN frequently undertakes contractual and other formal obligations to outside entities, such as intellectual property commercialization agreements, memoranda of understanding with other organizations, Business Associate Agreements, and non-disclosure agreements. Employees are expected to adhere closely and to act in good faith with regard to all obligations assumed by MRN.

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Individual responsibility and accountability. Employees should assume and exercise responsibility appropriate to their positions and roles. They are accountable to each other, to the organization, and to themselves for their actions and decisions not to act. When roles or responsibilities are unclear, they should take steps to obtain clarity regarding their duties.

Stewardship of property and funds. As recipient of federal government funds, as well as that of state government, foundations, private contributors, and others, MRN has a responsibility to expend those funds prudently. Employees should treat MRN property with care and avoid its waste and improper use. Further, they should not use MRN funds, property, or facilities for their personal benefit or for the benefit of non-MRN organizations, without proper approval.

Safety in the workplace. It is the policy of MRN to comply with all applicable state and federal laws designed to improve workplace safety. MRN is committed to training employees to carry out their work in a manner that is safe for them, their coworkers, research subjects/patients, and guests/visitors.

Appropriate treatment of confidential information. In their various capacities, MRN employees have access to confidential information of many different types. MRN employees are expected to be aware of HIPAA regulations and to maintain the confidentiality of information by safeguarding it and using it only as applicable restrictions permit.

Recording, allocating, and charging costs and effort. The accuracy and reliability of financial and effort reports is of paramount importance to the business operations of MRN. Employees must record, allocate, and charge costs and time worked accurately, and maintain supporting documentation as required by established policies and procedures.

Gifts, gratuities, and “kickbacks.” MRN employees should not personally accept any material gift, gratuity, or other payment, in cash or in kind, from any vendor seeking to do business with MRN or currently doing business with the organization.

Obligations to report suspected violations. Employees who are aware of or have reason to suspect a material violation of these standards, of laws and regulations, of related MRN policies and procedures, or of waste, fraud, abuse, or corruption, should report the situation as soon as possible. Reports can be made to a supervisor, unless there is reason to believe the supervisor may be involved with the possible violation. As an alternate, it is always appropriate to make reports to any senior manager, including the CEO, President, COO, CFO, or Medical Director. Employees should speak with whom they are most comfortable or whoever is most appropriate to the situation. It is the responsibility of MRN management to address all reports of variances from policies. An employee shall not be disciplined or otherwise penalized for reporting, in good faith, an allegation of suspected material violation.

Scientific responsibility. Employees, regardless of level or role, are expected to be committed to advancing scientific knowledge and the education of colleagues. Research should conform to generally accepted scientific principles and research integrity and should be based on a thorough knowledge of relevant scientific literature. Every precaution should be taken in research with human subjects to respect participants' rights, especially the right to confidentiality, and to minimize potentially harmful effects of research participation.

REVISION HISTORY:

DATE	REVISION	DESCRIPTION OF CHANGE
02/17/2011	0	Original Release

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08/27/2018	1	Updated information regarding to whom violations should be reported; minor formatting change.
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