

CODE OF  
**CONDUCT**



**HOSPITAL  
SÍRIO-LIBANÊS**

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## 1. WORDS FROM THE PRESIDENT

For a century, Sociedade Beneficente de Senhoras - Hospital Sírío-Libanês (Ladies' Charitable Society - Sírío-Libanês Hospital) has been committed to promoting health care, regardless of creed, race or socioeconomic status, as well as the development of education and research.

More than that, it has become a reference for its straightforward and transparent posture, the essential and inseparable basis of Sírío-Libanês culture.

The current situation of our country further reinforces the importance of acting ethically. Our Code of Conduct and internal policies reflect our commitment in view of this context.

By putting our “Living Together and Sharing” purpose into practice, we encourage fairer and fraternal social relationships. In addition, this code reinforces these relationships also need to be healthy, legitimate and always based on integrity and transparency.

As part of this institution, our actions, posture and engagement are essential to the dissemination and compliance with this Code of Conduct.

I count on cooperation, participation and involvement from everyone to meet this Code, which is the essence of all principles and ethical values that have always been observed by this institution.

Recognition of the importance of this Code and its fulfillment are essential for you to engage in the life of the institution and to the fulfillment of our mission.

**Marta Kehdi Schahin,**

*President of Sociedade Beneficente de Senhoras - Hospital Sírío-Libanês.*

## 2. PURPOSE, VISION, MISSION & VALUES



# HOSPITAL SÍRIO-LIBANÊS

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### **PURPOSE:**

Live together and share.

### **VISION:**

By living together and sharing, we contribute to a fairer and fraternal society.

### **MISSION:**

To be a warm, supportive and an excellent health Institution both in medicine and care.

### **VALUES:**

Research, human warmth, excellence and solidarity.

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### **3. INTENDED AUDIENCE**

- 3.1.** This “Code of Conduct” applies to the entire Sociedade Beneficente de Senhoras - Hospital Sírio-Libanês, its branches and employees, of any hierarchical level, including open clinical staff, volunteers, young apprentices, interns, trainees, statutory officers, directors, registrars, collegiate, student body, patients, companions, visitors and any third parties involved with Sírio-Libanês, herein called “Members”.
- 3.2.** Sírio-Libanês and its Members undertake to comply with applicable Brazilian law, the provisions of this Code of Conduct or other Sírio-Libanês’ internal policies and rules. In case of conflict between any content, applicable Brazilian law shall prevail.

### **4. RESPECT FOR CLIENTS**

- 4.1.** For this Code of Conduct, “Clients” mean patients of Sírio-Libanês and their legal representatives, companions or visitors.
- 4.2.** Sírio-Libanês and its Members undertake to:
  - a.** Treat all Clients politely, humanly, respectfully, kindly and understandably. This should also be the approach in the relationship between Members.
  - b.** Provide clear, prompt answers to the patients’ demands for information on services or therapies they are undergoing.
  - c.** Avoid personal comments about other team members or about workplace events. Intra- or extra-team relationship issues should be settled through appropriate channels, never before Clients.

- d. In case of any trouble with a particular Client, talk to your immediate superior about the best approach for that situation.
  - e. Do not bother Clients with personal, unnecessary matters. Members' approach should always aim at providing quality service by Sírío-Libanês.
  - f. Be discreet, requesting only information really necessary.
  - g. Disclose patient information only when strictly necessary for their therapy.
  - h. Keep focus on patients, matching results to their quality of life.
  - i. Ensure efficiency in the period of hospitalization and care.
  - j. When the care team and the Client relationship is worn out or unsustainable, or if requested by the Client, Sírío-Libanês undertakes, whenever possible, to provide an alternative team to ensure continuity of medical, nursing or any other care.
- 4.3.** Sírío-Libanês and its Members undertake to apply the most strict procedures for protecting patient information. This is necessary for patients to feel comfortable sharing it with Sírío-Libanês and its Members, allowing the best decisions. Any patient information is confidential, whether regarding to personal data or health status.
- 4.4.** Sírío-Libanês and its Members shall not allow the disclosure of any patient information in any media, except when authorized by the patient or by court order.

- 4.5.** Only assigned Members are allowed to access patient's medical records and test results, and are obliged to maintain confidential their content. These Members are prohibited from allowing access to medical records by individuals not bound to professional secrecy.
- 4.6.** Given the confidentiality of patient records, access by a Member not assigned to that patient will be limited to emergencies, and the reason for this access shall be duly justified.

## **5. RESPECT FOR PEOPLE**

- 5.1.** Sírio-Libanês and its Members respect diversity, as well as characteristics and personal values of each one, and will not allow any type of discrimination based on ethnicity, creed, nationality, gender, age, citizenship, religion, regional origin, physical disability or marital status, among others.
- 5.2.** Harassment and inappropriate behavior: Sírio-Libanês and its Members will not allow any behavior that may pose a risk to physical or psychological integrity of any individual. Such behavior includes, but is not limited to, sexual harassment, psychological harassment, physical assault or any other offensive behavior.
- 5.3.** Forced labor: Sírio-Libanês will not hire nor allow Subcontractors to hire forced or compulsory labor, as per applicable Brazilian law.
- 5.4.** Child labor: Sírio-Libanês will not hire nor allow Subcontractors to hire child labor, as per applicable Brazilian law.

**5.5.** Fair Hiring/Recruitment: Sírio-Libanês undertakes to follow a fair, impartial recruitment process, without biased influence of Members or Subcontractors.

## **6. RESPECT FOR THE INSTITUTION**

**6.1.** All activities and decisions of Sírio-Libanês and its Members, when performing their duties at the hospital, will be made and conducted in a straightforward and transparent manner, protecting the best interests of Sírio-Libanês and in accordance with applicable Brazilian law, the provisions of this Code of Conduct and other Sírio-Libanês' policies and internal rules.

**6.2.** Conflict of Interest: Sírio-Libanês and its Members will not allow agreements, actions or decisions that may generate potential Conflict of Interest.

**6.2.1.** "Conflict of Interest" means any situation or action that: I) affects or may affect professional conduct of Members while performing their duties at Sírio-Libanês; II) affects or may affect Members' ability to take actions or decisions for the benefit of Sírio-Libanês; III) affects or may affect the ability to take actions or decisions from other Members or Subcontractors, including Government Agents; or IV) intends to improperly obtain personal benefits and/or for Third Parties,

**6.2.2.** Typification of Conflict of Interest does not depend on materialization of damage or benefit.

- 6.3.** Fight against Corruption: Sírío-Libanês and its Members will not allow payment or receipt of any bribe, bribery or any other improper advantage, in Brazil or abroad. A simple promise will also be construed as an undue action.
- 6.3.1.** Any amount paid or received by Sírío-Libanês or its Members while performing their duties at the hospital should expressly reflect the agreement and/or fully and accurately reflect a lawfully transaction.
- 6.3.2.** For this Code of Conduct, “Improper Advantages” mean any advantage promised, offered or given to a Government Agent or a related third party in return for benefits or expected benefits. Such benefits are not limited to cash payments, and may include gifts, meals, entertainment, hospitality, discounts and job offers, for example.
- 6.4.** Fraud: any conduct of Members should be based on transparency, good faith and integrity. Regardless of benefits to Sírío-Libanês or Clients, fraudulent conduct will not be tolerated.
- 6.5.** Equipment, assets and inputs: Members shall rationally use Sírío-Libanês’ equipment, assets and inputs to prevent waste and solely to perform activities directly related to Sírío-Libanês operations. Their use for unlawful purposes, personal benefits, losses to other parties and/or funding for political activities is strictly forbidden. Each Member is responsible for ensuring that Sírío-Libanês’ assets are not damaged, stolen or misused.

- 6.6.** Donations and sponsorships: all donations and sponsorships made or received by Sírio-Libanês or its Members on its behalf should be documented and subject to prior approval by the Legal and Compliance Board.
- 6.7.** Financial and accounting controls: Sírio-Libanês and its Members undertake to control all transactions, preventing assets from being misused or used for improper purposes. In addition, they undertake to maintain an accounting record system that fully and accurately reflects all transactions. Agreements, invoices, reports, bills or any other documents related to procurement of goods and services should always reflect what was contracted.
- 6.8.** Data protection and confidentiality: Sírio-Libanês and its Members shall keep as confidential any data or information not public and/or whose disclosure has not been authorized by the owner. The confidentiality obligation shall remain even after termination or disqualification of Members.

## **7. RESPECT FOR THIRD PARTIES**

- 7.1.** For this Code of Conduct, “Subcontractors” mean any partner, supplier, service provider, consultant, agent, mediator, representative or any other party bound with Sírio-Libanês and not listed as Client or Government Agent.

- 7.2.** Sírio-Libanês and its Members undertake to maintain relationship with Subcontractors in an ethical and transparent manner, protecting the best interests of Sírio-Libanês and in compliance with the Brazilian law, the provisions of this Code of Conduct and other policies or internal rules.
- 7.3.** Under the Brazilian law, under certain circumstances, Sírio-Libanês may be held liable for Subcontractors' deeds. So, therefore, all Subcontractors shall meet this Code of Conduct.
- 7.4.** Sírio-Libanês and its Members undertake to ensure that hiring of Subcontractors, as goods or services providers, is impartial and based on technical specifications that fully meet Sírio-Libanês needs.
- 7.5.** Any amount paid or received by Sírio-Libanês or its Members while performing their duties at the hospital should expressly reflect the agreement and/or fully and accurately reflect a lawfully transaction.
- 7.6.** Sírio-Libanês and its Members shall not accept nor offer gifts, meals, entertainment, hospitality, discounts or job offers, or any other from third parties, in return for benefits or expected benefits or that conflict with Sírio-Libanês' internal policies and rules.
- 7.7.** Sírio-Libanês encourages Subcontractors to implement their own Compliance program, consistent with all provisions set forth in this Code of Conduct.

## **8. RESPECT FOR GOVERNMENT AGENTS**

- 8.1.** For this Code of Conduct, “Government Agents” mean any individual who, even if transiently or without compensation, (I) provide a civil service; (II) work or hold an office in a Brazilian or foreign public body; (III) work or hold an office in a company or institution controlled or managed by the government; (IV) represent or hold an office in a political party; or (V) are candidates for political office.
- 8.2.** Sírio-Libanês and its Members undertake to maintain relationship with Government Agents in an ethical and transparent manner, protecting the best interests of Sírio-Libanês and in accordance with the Brazilian law, under the provisions of this Code of Conduct and other Sírio-Libanês’ internal policies and rules.
- 8.3.** Due to several agreements with the public authorities, Sírio-Libanês usually receives public funds. Sírio-Libanês and its Members undertake to apply such funds appropriately, and allocation other than that provided in agreement or by law is forbidden.
- 8.4.** Any amount paid or received by Sírio-Libanês or its Members while performing their duties at the hospital should expressly reflect the agreement and/or fully and accurately reflect a lawfully transaction.

**8.5.** Sírio-Libanês and its Members shall not promise, offer nor give any improper advantage to a Government Agent or a related third party in return for benefits or expected benefits. Such advantage is not limited to cash payments, and may include gifts, meals, entertainment, hospitality, discounts or job offers, for example.

## **9. RESPECT FOR FREE COMPETITION**

**9.1.** All activities and decisions of Sírio-Libanês and its Members while performing their duties at the hospital will be independently made, meeting all principles of free competition and the Brazilian law.

**9.2.** Sírio-Libanês and its Members shall not permit any conduct in any form of manifestation that violates or may violate the economic order according to applicable Brazilian law, such as abuse of dominant position, pricing agreements, collusion to circumvent bidding, among others.

## **10. RESPECT FOR THE ENVIRONMENT, HEALTH AND SAFETY**

**10.1.** Sírio-Libanês and its Members undertake to comply with environmental and health legislation as well as Sírio-Libanês' internal policies and rules towards environmental protection.

**10.2.** Sírio-Libanês' environmental management should aim at sustainable development through proper waste disposal and rational consumption.

- 10.3.** Sírio-Libanês values safety of Members and Subcontractors, and requires them to make efforts to meet all safety rules.
- 10.4.** Members shall not work under the influence of illicit drugs or alcohol. In turn, tobacco smoke will only be allowed in places authorized by the local law and in intended areas.
- 10.5.** Sírio-Libanês will not allow access to its premises by people carrying firearms, bladed weapons or any other flammable or explosive substance that may be life-threatening, unless brought by authorized persons to perform their duties.
- 10.6.** Sírio-Libanês and its Members undertake to meet the highest hygiene rules.

## **11. EDUCATION AND RESEARCH**

- 11.1.** Education: courses and teaching activities should focus on professional and educational development of students.
  - 11.1.1.** Interaction with industrial companies is often required to conceive projects with quality and excellence. Decisions and agreements with companies on projects should always aim at the best interest of students and should never be influenced by the industry.

**11.1.2.** Students should be selected through a fair selection process, considering the applicant's technical skills. Whenever individuals are asked to influence a particular selection process, regardless of the hierarchical level of the one who attempted to intervene, the Legal and Compliance Board should be immediately notified.

**11.2.** Research: The priority of Instituto de Ensino e Pesquisa (IEP) is to ensure the best use of research for the benefit of society and the development of the health sector. Industry sponsorship is common to make projects feasible. However, while conducting research, Members should act impartially, transmitting results that reflect the work developed. A result should never intend to improperly benefit a Subcontractor.

**11.2.1.** Whenever a Member is asked by a Subcontractor, mainly a manufacturer or distributor of health products or drugs, to influence research conducted by Sírío-Libanês, the Legal and Compliance Board should be immediately notified.

**11.2.2.** Every Member who has a relationship with any sponsor of IEP projects must declare potential conflict of interest to the Legal and Compliance Board.

## **12. POLITICAL ACTIVITIES**

- 12.1.** Sírio-Libanês does not take political partisan positions and does not make donations, contributions or provides support of any nature to political parties, organizations or its representatives.
- 12.2.** Sírio-Libanês respects freedom of expression and manifestation and participation of its associates in any form of political activity, party association and their decision to run for public or political office; these activities are entirely personal and clearly separated from Sírio-Libanês.
- 12.3.** Sírio-Libanês shall not allow associates to use their institutional position, resources or means when expressing their political opinions and active participation of any nature to influence personal decisions of others.
- 12.4.** All types of political advertising and activities are forbidden at Sírio-Libanês premises and Sírio-Libanês image and name shall not be employed for political activity or advertising.

## **13. REPORTING CHANNELS**

- 13.1.** Members who suspect or find any misconduct shall report it immediately to the Legal and Compliance Board via one of the reporting channels.

- 13.2.** Any other person may report it to Sírio-Libanês. Complaints should be made in an ethical and transparent manner, and should not intend to satisfy self or Subcontractor interests or ruin the image of others.
- 13.3.** The complainant may report anonymously or identify himself.
- 13.4.** All information provided by the complainant will be treated as confidential and will only be disclosed to those involved in the investigation process.
- 13.5.** Sírio-Libanês shall not allow any retaliation, mainly against the complainant.
- 13.6.** Complainant who provenly make a false report or who intends to satisfy his or her own or Subcontractor's personal interests or to ruin the image of a Subcontractor may be subject to legal or disciplinary action, as provided for in the Brazilian law.
- 13.7.** Complaints should be formalized through the following reporting channels:
- 0800 6026907
  - Intranet
  - Internet: [www.hospitalsiriolibanes.org.br](http://www.hospitalsiriolibanes.org.br)

- 13.8.** All complaints will be received, recorded and investigated by the Legal and Compliance Board.
- 13.9.** The complainant will be given a protocol number with which he or she may follow up on the complaint.

## **14. CONTROL OF COMPLIANCE PROGRAM RECORDS AND DOCUMENTS**

- 14.1.** The Legal and Compliance Board shall maintain a record of all reports, information, documents produced and measures taken during the complaint processing, as well as the method used in the investigations.
- 14.2.** Delete or change any document that may be requested by public bodies is strictly forbidden. Whenever a Member is caught eliminating or changing any document, the case should be immediately discontinued and the Legal and Compliance Board notified.

## **15. TRAINING**

- 15.1.** As a measure to disseminate the subjects covered by the Code of Conduct, Sírío-Libanês periodically applies training to Members and Third Parties.
- 15.2.** Everyone called should attend, regardless of hierarchical level or position.

## **16. COMPLIANCE PROGRAM MONITORING**

- 16.1.** Implementation of the Sírio-Libanês Compliance Program is an initiative of the Ladies' and the Executive Board, which will support and make every effort to ensure its proper functioning and adherence by Members, Subcontractors and Clients.
- 16.2.** Monitoring is made by the Legal and Compliance Board, supervised by the Integrity and Conduct Committee.
- 16.3.** All Members, including Sírio-Libanês' board members, shall meet all requests from the Legal and Compliance Board objectively and timely.

## **17. DISCIPLINARY ACTIONS**

- 17.1.** Violation of the Code of Conduct, the Sírio-Libanês internal policies or applicable Brazilian law may result in penalties that, based on the severity of the facts, may range from a verbal warning to the termination of employment or accreditation to Members or termination of agreement to Subcontractors.



# HOSPITAL SÍRIO-LIBANÊS