## HIMSS

Healthc are Information and Ma na gement Systems Society

## CODE OF CONDUCT

## HIMSS

## About Us

HIMSS is a globalvoice, advisorand thought leader of health transformation through health information and technology. With a unique breadth a nd depth of expertise and capabilities, we work to imp rove the quality, safety, a nd effic iency of health, healthc are and care outc omes.

HIM SS enc ompa sses more than 80,000 ind ivid uals, of which more tha n two-thirds work in healthc are provider, governmental and not-for-profit orga nizations a cross the globe, plus over 600 corp orationsa nd more than 450 not-for-profit parnerorganizations.

Our vision is to realize the full health potential of every human, everywhere.
Our mission is to reform the global health ecosystem through information and technology.

We believe in the following core values:
Curiosity: We innovate in all we do.
Belonging: We build strong bondsofconnection.
Integrity: We lead with respect a nd trust, a lways.
Tenacity: We a re driving by our mission.
Simplicity: We a re smart in our a pproach.

## HIMSS

## A Message from our President \& CEO

DearColleagues,
We at HIMSS a re proud to conduct all business rooted in our core va lue s of curiosity, belonging, integrity, tenacity and simplicity. These valuesdefine what we believe in, what drivesus, a nd ourcollective motivationsasanorga nization dedic ated to transforming health.

We furtherdefine ourcore valuesthrough our Code of Conduct. Respect a nd trust cannot be taken forgranted, and must be felt within all the ways we conduct business. Each of us is responsible for upholding the trust of our members and business partners, a nd protecting our reputation within the healthcare ecosystem.

With that in mind, we are placing a renewed focus on compliance within our organization, and are pleased to a nnounce an updated Code of Conduct for HIMSS that conta ins general guid elines forma na ging business with the highest standards of ethics. As members of HIMSS, we have a responsibility to comply with the la w and to make decisions based on the orga nization's best interests.

No code of conduct can antic ipate every situation we might face asan organization. In these cases, HIM SS relies on your personal a nd professional integrity. Use good judgment and speakup when you are unsure a bout a situation. When in doubt, ask questions. Talk to colleaguesand mana gement. If you are a ware of conduct that may violate our Code, you have an obliga tion to report it - eitherto your ma na ger, Human Resources, LegalAffa irs, orthe HIMSSC ompliance Hotline. Each of us has a role to play in ensuring we live ourcore values, maintain our good reputation a nd secure ourfuture as an influential and trusted part of the global health ecosystem.

Please fa milia rize yourself with the Code of Conduct and commit to following it in your da ily work. O ur good na me is built up on trusting relationships. I a m confid ent that, together, we have the integrity a nd ta lent to continue rising to the challenges faced by healthc are systems a round the world.

Sincerely,


Harold F. Wolf, III

President \& CEO

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## HIMSS

## 1 Introduction

### 1.1 Purpose

At HIM SS, ourvalues and ethic sform the foundation of our success as a global voice, advisorand thought leadersupporting the transformation of the health ecosystem through information a nd technology. Ourvalues a nd ethics a lso inspire the trust and confid ence of our members, providerorganizations, non-profit partners, a nd health service organizations-all of whom are essential to a c complishing our mission a nd vision. This Code of Conduct will guide us in our da ily work a nd help us fulfill our mission in an ethic al work environment.

### 1.2 Applic ability

This Code of Conduct a p pliesto everyone who works fororon beha lf of HIMSS. This includes all members of our boards, ma na gement, employees, consultants, contractors, and volunteers. There are no exceptions.

We must also exerc ise properoversight of contractors, consultants, and vendors who provide servicesto oron behalf of HIM SSand ensure theyare a ware that they must abide bythis Code and otherapplicable policies.

### 1.3 Ac c ounta bility

Each of us is resp onsible for a dhering to the standards in this C ode. We must work cooperatively to foster and sustain a culture that sup portsethic sand compliance. By und erstanding this Code of Conduct and ourpolicies, a nd a sking questions when uncerta in, we all help ensure HIMSS rema ins a great place to work a nd is wellpositioned to fulfill our vision and mission.

Acting with integrity a nd doing the right thing a re the driving forces behind HIMSS' success. HIMSShas been, a nd continuesto be, committed to conducting its business in an ethic al ma nner-doing right by our employees, members, business partners, stakeholders, a nd communities. We sha re the resp onsibility for protecting a nd a dva ncing HIM SS' reputation; the Code provides you with guid elines for meeting your ethicaland legalobligationsat HIMSS.

### 1.4 Non-Retaliation

HIMSS is committed to ma inta ining a n env ironment in which all of us canspeak candidly a bout our concerns a nd report suspected violations of our Code of Conduct and policies. Management hasadditional responsibilities to promote an environment of compliance. HIMSS does not tolerate retaliation a ga inst ind ividuals who make good faith reportsof suspected illegal, unethicalorotherwise ina p prop riate behavior orpartic ipate in investigations rela ted to such reports. Reta liation inc lud es taking a ctionsthat a dversely a ffect the terms orconditions of the ind iv id ual'semployment, loss of job, punitive work a ssignments, or reductionsto sa la ry or wa ges.

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Anyone who retaliatesagainst an individual who makes a good fa ith report of suspected violations of law, policies, orthis Code of Conduct orpartic ipates in an investigation related to suspected violations is subject to disciplinary action, up to a nd including termination. Forpurposesof the Code, "good faith" means acting with honesty or sinc erity of intention.

If you believe you or someone else is the victim of retalia tion, you should report it immediately to Human Resources, Legal Affa irs or you may make an a nonymous report via the internet at https://www.himss.ethic spoint.com.

### 1.5 Compliance Responsibilities

This C ode of Conduct cannot gua rantee ethicalbehavior - each of us must do our part to conduct ourselves and our businessethic ally a nd consistently with ourcore values. We expect all of our employeesto:

- Fa milia rize yourse If a nd comply with the variouspolicies, procedures a nd sta ndard sof HIMSS. Be sure to check with your ma na ger for a ny job-specific information.
- Complete required training in a timely manner.
- Commit to complying with all a p plic able la ws, regula tions, sta nda rds, polic ies a nd proced ures of HIMSS.
- Speakup when you are unsure of what to do.
- Cooperate with investigations.
- Be proactive. Look for and speak up when you see noncompliance.

Those in ma na gement have additional responsibilities when it comesto complia nce. At HIMSS, we expect all of our ma na gers to:

- Fostera culture of ethic sa nd complia nce through personallea dership.
- Be proactive - ta ke stepsto prevent violationsbefore they happen.
- Become fa milia rwith a nd understand the Code of Conduct and our policies a nd procedures. Encoura ge questionsfrom your tea ms a nd a sk for help when need ed from Human Resources or Legal Affairs.
- Promptly report all possible violations of this Code, our polic ies and procedures, a nd applicable legal requirements.
- Promote understanding of a nd adherence to ournon-retaliation policy. Ensure that those on your teamare encouraged to speakup when they see something that may be a miss.
- If you work with consultants, contractors, orvend ors, ensure they a re a ware of our Code of Conduct and its a p plic ability.
- Most importantly, rememberthat creating a culture of compliance is part of your job.


### 1.6 Violations

Each of us is expected to comply with a ll applic able laws, polic iesand thisCode. We are also responsible foracting in good faith and reporting possible violations a nd suspected wrongdoing. Disciplinary action, up to a nd including termination, may be taken for noncompliant behavior.

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## 2 Respect for Each Other

### 2.1 Respectand Fair Treatment

HIMSS is dedic ated to a workplace where everyone, inc lud ing employees, members, customers and vendors, a re treated with dignity a nd respect. At HIMSS, we a re committed to promoting and maintaining an inclusive, high-performing culture where everyone is able work to their full potential. Each of us is responsible for creating a climate of trust and respect conducive to a productive work environment. The standardsof conduct described in our Code, our Emp loyee Ha nd books, a nd our polic ies serve asthe foundation forthe behaviorthat is expected of each of us.

We believe a keyelement of our success as a globalorga niza tion is the diversity of backgrounds, experiences, perspectives, a nd talents within our workforce a nd membership. We emb race this diversity a nd treat each other fa irly a nd respectfully.

### 2.2 Anti-Harassment

HIM SS does not tolerate ha ra ssment of a ny kind by a nyone working within or on beha lf of our orga niza tion. Ha rassment und ermines our a bility to work to gether a nd is contraryto ourcore valuesand mission.

Ha ra ssment can take many forms. A few exa mples of ha ra ssment include:

- Jokes, insults, orinappropriate commentsabout a person'ssex(including pregna ncy), sexual orientation, genderidentity, race, physic al ormental d isa bility or c ond ition, religion, color, ma rital status, na tional origin, citizenship status, veteran's status (including circumstances of disc harge), use of medic al marijua na, orgenetic information.
- Unwelc ome orinappropriate sexualadvances, sexual remarks, displays of offensive materials, requestsforsexual favors, a nd other unwelc ome verbal or physicalconduct of a sexual nature.
- Verbalorphysicalconduct thatcreatesanintimidating or hostile work environment.
- Communic ating ordisplaying offensive material in the workplace.

If you observe or are the victim of workplace ha rassment, you must report it immediately. You should contact yourmana ger, the Human Resources Department or Legal Affairs. You may also report such conduct a nonymously via the internet at https://www.himss.ethic sp oint.com.

Anyone found to have engaged in workplace harassment will be subject to disc iplinary action, up to and including termination. If a vendor or otherperson with whom the orga nization does business enga ges in unla wful ha ra ssment, disc rimina tion, or reta liation, HIMSS will ta ke a p propriate a ction to remed y the situation.

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### 2.3 Safe and Healthy Work Environment

Creating and mainta ining a sa fe a nd hea lthy work environment at HIMSS is paramount. There are simple and practicalstepsthat we canall take to help make our workplace as hea lthy a nd sa fe a s possible, including:

- Follow sa fety standards
- Report sa fety concerns a nd a ccidents in a timely ma nner
- Fa milia rize yourse If with sa fety-related resources.

Nothing is more important than ensuring the sa fety and security of those who work at a nd with HIMSS. Threats, threatening behavior, or acts of violence by a nyone in the workplace will not be tolerated and should be reported immediately.

Aspart of ourcommitment to a safe and healthy environment, HIM SS ma intains a strict polic y a ga inst the use of a lcohol a nd unla wfuldrugs in the workplace. Reporting to work underthe influence or using, possessing, selling, orpurc ha sing a lc ohol or unla wful drugs while on HIMSS property (inc luding parking lots) is strictly prohib ited. Employees who a re ta king presc ribed medic ations that ha ve an adverse effect on performance orgive rise to sa fety concerns should a dvise their ma na ger or the Human Resourc es Department. Such communic ations will be treated as confidential and rea sonable accommodation will be provided asapplicable.

HIMSS a Iso has a no-smoking policy and is a smoke-free environment. Smoking is not permitted in the workplace, the build ing, or smoke-free environments when a ttending sponsored meetings a nd events.

HIM SS is committed to supporting a safe a nd healthy work environment. Each of us is responsible for complying with safety rules and regulationsand taking necessary precautionsto protect ourselvesand ourcolleagues. All accidents must be reported immediately to Human Resourcesand unsafe practicesorconditions remedied.

## 3 Building Trust with our Business Practices

### 3.1 Business Relationships

We a re committed to meeting orexceeding members' a nd customerexpectations regarding the development a nd delivery of our products a nd services. We a chieve qua lity through consistently developing high-value produc ts a nd delivering outstanding services in a timely ma nner. By listening to a nd respecting the need sof our members, customers, a nd businesspartners, we incorporate our quality standardsinto everything we do. This is how we rema in relevant and fulfill our mission to reform the global health ec osystem through information and technology.

We treat our business partnersfa irly a nd expect the sa me in return. When selecting business partnersornegotiating contracts, we make decisionsin a fairand objective manner with the best interests of our orga niza tion a nd membership in mind. We will

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enga ge only reputa ble, qua lified ind ividuals orfirms a s consulta nts, a gents, representatives or sup pliers a nd a ny compensation a rrangement must be fa ir market value a nd commercially rea sonable.

### 3.2 Competition and Fair Dealing

We seek to outperform our competition fa irly a nd honestly. We seek comp etitive advantagesthrough superior performance - neverthrough unethic al orillegal business practices. Misappropriating proprieta ry information or possessing or a c cessing trade sec rets without consent is strictly prohibited and a ga inst the ethos of our organiza tional culture. Eachemployee, offic erand director should respect the rightsof, and deal fa irly with, our customers, sup pliers, vendors a nd competitors. No employee, offic er or direc tor should ta ke unfa ir a d vantage of a nyone through ma nip ula tion, c oncealment, a buse of privileged information, misrep resentation of material facts, orany otherillegal trade practice.

A ntitrust la ws are intended to preserve a free and competitive marketplace. HIMSS requires full complia nce with these la ws. No employee, offic er ord irector is permitted to enga ge in price fixing, bid rigging, allocation of marketsorcustomers, or otherwise restrain trade. We make no a greements orgeneralunderstandings with competitors concerning customers orterrito ries.

Asan association, we do not share orexchange price orbid information with competitors, including those who may be members of HIMSS. This includespric ing policies, disc ounts, promotions, royalties, a nd terms a nd conditions of sale. If a competitorvolunteers such information (whether at a meeting oreducational conference), we must immedia tely end the conversation and bring the situation to the a ttention to the Legal Affa irs Department. Although the exc hange may be intended innocently, it could create the appearance of price fixing orbid-rigging a nd, therefore, must be a ppropriately addressed.

Fa ir competition is a matteroflaw in virtuallyeverycountry where we do business. In some geographicalregions, there are additionallegal requirements with which we must comply. Every ma na ger must ensure that allemp loyees involved in marketing, sales, and purchasing a re a ware of the letter and spirit of our sta ndards a nd the applicable competition laws.

If you have a ny questions a bout the law oryour legal obligations related to fair competition, please consult the Legal Affa irs Department.

### 3.3 Marketing and Advertising

As an a ssociation exclusively foc used on providing globalleadership forthe optimal use of healthc are information a nd tec hnology, the global health ec osystem relies up on us to present useful, relevant and accurate information in an honest and fairway.

Trustworthy ma rketing a nd a dvertising educ ates the public, provides informa tion to customers, members, a nd partners, a nd inc rea ses a wareness of our brand. Additionally, federaland state lawsand regulationsare designed to sa feguard the public by

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ensuring that ind ividuals a re provided with information that is truthful a nd not deceptive. For these rea sons, a ny a dvertise ment must a void mislea ding or unfa ir representations. This a p pliesto information conveyed in a ny form whether it be print, electronic, ora udio.

Asa meansto preserve ourbrand and maintain ourcredibility, we do not endorse productsorservic es of our members or customers. This does not mean that we cannot enga ge in focused dia logue ordisseminate factual information. We must alwaysbe mind ful, however, that while we may facilitate dia loguesbetween members, customers, the public, a nd governments, we do not lose our impartia lity or otherwise allow a for-profit entity to use ourname or goodwill for its private benefit. As such, we do not allow others to use the HIMSS na me orbrand in their marketing materialsor otherwise c ommerc ia lize their a ssoc iation with HIM SS.

### 3.4 Privacy and Sec urity

Keeping member and customer information confidential, private and secure is essential to preserving ourtrust and credibility within the healthcare ecosystem. All such information must be stored securely, whether in electronic orpaperform. Employees transmitting confid ential information electronic ally must do so in a mannerthat ma inta ins the confid entiality of the doc ument.

We respect the privacy and dignity of our fellow employees a nd sa feguard the confid entiality of employee records. We will protect employee's personal information a nd use it only for legitima te business purposes in a c cordance with all a p plicable la ws.

### 3.5 Business Records and Communications

### 3.5.1 C omplete and Accurate Records

M a inta ining complete and a c curate records is essential to our orga nization. We make decisions based on information recorded at every level of our business. Incomplete or ina c c urate information maylead to poordecision making, negative consequences, a nd erosion of the trust placed in us by our members, customers, vendors a nd government agencies.

All of us a re required to record all HIM SS information honestly, a c c urately a nd timely. All of our books, records a nd a ccounts must a p propriately reflect our transactions, must be made promptly, a nd must conta in all material information. We must nevercreate or change a record forthe purpose of misleading anyone, and no relevant information should everintentionally be left out, hidden, falsified, or covered up. This a ppliesto all b usiness records a nd communic a tions, inc lud ing fina nc ial information, timesheets, expense reports, and personnelfiles.

Anyone who providesdata orinformation that they know orhave reason to believe is false is subject to disciplina ry action, up to a nd including termination.

Full cooperation is required if you a re a sked to participate in an internaland external a udit. Should you become a ware of a ny weaknessin internalcontrols, structures, or

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proceduresfor reporting financial or othersensitive information, you a re required to report the matterto yourmanager, the Human ResourcesDepartment, or Legal Affairs. Alternatively, you may make an anonymous report via the internet at https://www.himss.ethic spoint.com.

### 3.5.2 Document Retention and Destruction

Effic ient a nd effective business practices, in addition to polic y a nd a p plic able la ws and regulation, require us to keep books and recordsthat accurately and fa irly reflect our a ctivities. Each of us is required to adhere to ourdocument retention and destruction policy.

The retention and disposal of allorganiza tionalrecords must be done in accordance with a pplic able federal, state and locallaws and regulations. Retention and ma intena nce of documents is necessary for the properfunctioning of the orga niza tion, a swell asto comply with legal requirements.

To ensure the effic ient functioning of HIMSS, recordsshould not be kept if they a re no longerneeded orrequired bylaw. Should HIMSSeverbecome subject to a dutyto preserve orneed to halt the destruction of documents due to litigation, an a udit ora government investigation, or if such a ction is rea sonably a nticipated, then a ny scheduled document destruction must be suspended and all relevant documents preserved in their original form.

Records include information in a ny format, whether that be paper, electronic, a udio, or video.

Fa ilure to comply with this polic y could result in disciplinary action, up to a nd including termination.

### 3.6 Safeguarding and Proper Use of HIMSS Assets

HIM SS p roperty a nd a ssets a re intended to be used for business purposes. We are all resp onsible for sa fegua rding our organiza tional a ssets a ga inst misuse, wa ste, da ma ge, loss, imp a irment, a nd theft.

O ur a ssets inc lude such things like orga nizational fund s, equip ment, business knowledge, a nd proprietary information. We all rely on access to these a ssetsto do our work. Therefore, it is imp orta nt that we not exploit a ny HIM SS p roperty, information, services, resources, or othera ssets forpersonal ga in or benefit.

### 3.6.1 IntellectualProperty

The intellectual p roperty of HIM SS (inc luding its sub sid ia ries) a re one of HIM SS' most signific a nt a ssets. This includes, but is not limited to, the HIM SS na me, logos a nd marks, the na mes, logos a nd marks of HIM SS' subsidiaries, da ta produc ts, methodologies, a na lysis, c urric ula, research, know-how, tools and public ations generated by employees during the course of employment or on behalf of HIMSS. As the property of HIMSS, such information should only be used for business purposes.

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You should immedia tely report to yourmanager, the Human ResourcesDepartment or Legal Affairs a ny circ umstance that may constitute a suspected theft or loss of intellectual property.

### 3.6.2 C onfidentialInformation

Everyone who works for or on beha lf of the organization - including offic ers, directors, employees, a gents, consulta nts, contractors, a nd volunteers - has a duty to protect HIM SS a ssets, includ ing but not limited to its confid ential a nd proprietary informa tion.

We all must ma inta in the confid entia lity of proprietary information entrusted to us by our members, customers, suppliers, a nd government a gencies with whom we do business. Disc losing such informa tion might result in harm to ourmembers a nd our orga niza tion. For this rea son, you should not disc uss HIMSS p rop rietary informa tion with a nyone outside of the orga niza tion unless such disc losure has been a p proved in advance.

Proprietary information inc lud es all non-p ublic informa tion of the HIMSS. It inc lud es informa tion that sup pliers a nd customers have entrusted to us.

Informa tion that has been made public, such as in press releases, news a rtic les or a dvertisements, is not considered confidential a nd does not require protection.

It is the resp onsibility of each of us to use disc retion in ha nd ling confid ential a nd prop rietary information so that it is not ina dvertently disc losed. If you a re unsure about whether certa in information is confidential, presume that it is.

The obligation to preserve confidential and proprietary information continueseven a fter employment orother work on behalf of HIM SS ends.

### 3.6.3 InsiderTrading

All non-public informa tion a bout HIMSS should be consid ered confid ential information. Emp loyees, offic ers a nd directors who have access to confid ential informa tion regarding HIMSS or a ny otherentity as a result of theirwork for or on beha lf of the organiza tion a re not permitted to use orshare that information except to conduct HIMSS business. To use non-public information forpersonal fina nc ial benefit or to "tip" others who then might make an investment decision based upon such information is not only unethical, but potentially illegal.

Additionally, ourd irectors, offic ers a nd employees will not enter into transactions that are based on nonpublic information learned in the course of conducting HIM SS business, ordivulge inside information to others who then engage in such transactions. These activitieserode our members' a nd customers' trust in us a nd potentially subject us to fines, imp risonment, a nd civillitigation.

If you have a ny questions a bout the use of confidential information, please contact the Legal Affa irs Department.

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### 3.7 Comorate Opportunities

No employee, offic er ordirectormay use confidential a nd proprieta ry information for personal ga in nor should a ny employee, offic er ordirector compete with HIM SS directly or ind irectly. Employees, officers a nd directors must always act in the best interests of the orga niza tion. Plea se a lso referto Section 4.3 C onflic ts of Interest.

Should you have anyquestions, please contact the LegalAffa irs Department.

### 3.8 Gifts and Business Courtesies

Strong rela tionshipswithin the healthc are ecosystem a re vitalto ourbusiness as is our reputation and credibilityasa globaladvisor. OurCode requires that all of us demonstrate HIMSS' commitment to treating everyone with whom we interactordo b usiness with, imp a rtia lly.

While at times it may be acceptable to give orreceive a modest gift orbusiness courtesy froma member, customer, vendor, orotherbusiness associate, we are prohibited fromgiving, requesting, orreceiving a nything of value that is intended to create orestablish a businessadvantage. At HIMSS, we do not give, solic it oraccept the following from any third party which may be perceived asan improperattempt to influence business decisions:

- C a sh orcash-equivalents including gift certific ates, gift cards or coupons
- Gifts, hospitality orentertainment that would be viewed a simproperorotherwise outside of the norm
- Gifts, hospitality orentertainment that are received orgiven on a routine basis
- Gifts, hospitality orentertainment that a re in questionable taste
- G ifts, hospitality orenterta inment to government orpublic offic ia Is or representatives

Gifts, hospitality, entertainment, or other form of business courtesies ma y be a c cepted orprovided only if a ll of the following criteria a re met:

- The gift, hospitality orentertainment does not violate a nyla w or regulation;
- The gift, hospitality orentertainment cannot be construed as a bribe, payoff, deal, orotherattempt to gain advantage orotherwise influence a business decision; AND
- The gift, hosp itality or entertainment is of modest value.

Gifts a re benefits of a ny kind given to someone asa sign of a ppreciation orfriend ship without expectation of receiving a nything in return. They include "courtesy gifts", which a re small gifts given at culturally recognized occasions orspecial times of the year.

Hospitality generally inc lud es refreshments, mea ls a nd a c commodation.
Entertainment genera lly includes a ttendance at an event, performance or activity such assporting events, concerts, ortheaterproductions.

Business Courtesies is a genera Iterm that inc lud es business-related hosp itality, entertainment, favors, and servicesthatare provided forfree orat a discounted rate.

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We recognize there may an occasion when gift giving is customary a nd expected in certa in a reas a round the world. In such cases, gifts are permissible only if they are of modest value, a re legal and customary in the jurisd ic tion in which they a re given, and will be given openly. Written a uthorization from the Vice President of Human Resourc es, Legal Affairs orthe Chief Fina ncialOffic er is required priorto provid ing a ny foreign offic ial with a ny gift, hosp ita lity or enterta inment.

Receiptsforgifts offered must be itemized a nd a c curately recorded within ourfina ncial records. Any gift given orreceived must comply with all a pplicable la ws, polic ies a nd this Code.

Should you have any question about whetherto give orreceive a gift, please contact the Human Resources Department or Legal Affairs.

## 4 Corporate Citizenship

### 4.1 Compliance Program

We are a globalorganization operating in many countries a round the world. We are a corporate citizen of multiple countries a round the world. We often engage in business a ctivitiesas a guest in othercountries. These activitiessubject us to a myriad of laws that a re complexand sometimes diffic ult to understand. HIMSS ha sesta blished a Compliance Program to provide education, establish intemalcontrols, a nd monitorour performance to ensure compliance.

Asa not-for-profit organization, we have a resp onsibility to the public trust to make decisions ba sed solely on HIM SS' best interests, without regard to personal consid erations. Open and transparent activities not only promote trust and confidence in our orga niza tion, but they a lso serve to disc ourage unethic al, unla wful and fra ud ulent a ctivity.

### 4.2 Ethical Business Practices

We observe the highest sta nd ards of business a nd personal ethic sin the conduct of our duties a nd responsibilities. Ea ch of us must practice honesty a nd integrity in every a spect of dealing with fellow employees, members, customers, the public, our a ffilia ted communities and government a uthorities. No employee should be misguided by a ny sense of loya lty to HIMSS that might cause him or her to disobey a ny a plicable la w or policy.

### 4.3 Conflic ts of Interest

We a void becoming involved, whetherdirectly orindirectly, in a ctivitiesthat impa ir or could be perceived to impa ir ourb usiness jud gment. Each of us is resp onsible for reporting allactualand potential conflictsof interest. You mayaccessa Conflict of

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Interest Polic y and Questionnaire at https://www.himss.ethic spoint.com through the Conflicts of Interest tab.

A conflict of interest exists when a person'sprivate interest interferes in a ny way, or even a ppearsto interfere, with the interests of the organization. A conflict situation can a rise when a $n$ employee, offic er or direc torta kes a ctions or ha sinterests that may ma ke it diffic ult to objectively a nd effectively perform his/her work for HIMSS. It is imma terial whether the ind ividual wa s origina lly a wa re of the conflict. A nyone that discoversa conflict during orafter-the-fact must report it immedia tely to the Human Resources Department or LegalAffairs.

Conflicts of interest may a lso a rise when an employee, offic erordirector (ora member of his/ her fa mily) receivesimp roperpersonal benefits due to his/ her position with HIMSS. For example, loans orgua rantees of obligationsto employees, offic ers, a nd directors (ortheir fa mily members) by HIMSS may create conflic ts of interest.

Conflicts of interest may a Iso a rise when a n employee, offic er, or direc tor of HIMSS work for a competitor, vendororsupplier. Forexample, if an employee works or otherwise performs servicesfora competing orga niza tion orone that may have an existing business rela tionship with HIMSS, including a cting a s a n offic er, director, consultant or volunteer, such activity maycreate a conflict of interest.

Conflicts of interest are prohibited asa matterof policy, except asotherwise approved or a uthorized in writing by Legal Affa irs. Conflic ts of interest ma y not alwa ys be clearcut, so if you have a question, you should consult with yourmana ger, Human Resources or Legal Affairs. Anyemployee, officer, ordirectorwho becomes a ware of a conflict or potential conflict must report it immediately and complete an updated Conflictsof Interest Questionnaire.

### 4.4 Fraud, Waste and Abuse

The integrity of our orga niza tion is pa ra mount. We must neverpartic ipate in a ny illegal or fra udulent a ctivity at work. Fra ud is generally defined as a deliberate a ct (orfailure to act) with the intention of obtaining an una uthorized orillegal benefit. Examples of fra ud ulent conduct include, but a re not limited to:

- Bribery
- Embezzlement
- False financialreporting
- C redit card fra ud
- Identify Theft
- Expense a c count ortimec ard fraud
- Fra udulent billing of vendorsorcustomers
- Software piracy
- Illegala lteration, ma nip ulation ord estruction of files

Additionally, at HIMSS we gua rd a ga inst a buse a nd wa ste a s such behaviors a re inconsistent with our mission a nd our core values.

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Abuse is defined a sthe intentional wrongful or imp roper use of HIM SS resources, or position or a uthority within HIMSS.

Waste us the extravagant, careless, or need lessexpend iture of HIMSS funds.
HIMSS is committed to conducting our businessin complia nce with all legal obligations and maintaining a workplace where information concerning possible illegalconduct canbe reported in good faith free of the fear of retaliation. We will investigate all c redible allegations of potentialillegal conduct, including waste, abuse or fra udulent use of HIMSS resources.

If you a re a ware of a ny fra udulent a ctivity, you must report it immedia tely to the Human Resources Department or Legal Affairs. You mayalso make an a nonymous report via the intemet at https://www.himss.ethic spoint.com.

### 4.5 Whistleblower Protection

HIMSS is committed to conducting its business in complia nce with its lega l obliga tions and to mainta ining a workplace where employeescan raise their good faith concerns free of the fearof retaliation.

HIMSS will investigate all credible allegations of potential illegal or unethic a l cond uct by employees, contractors, consultants, volunteers, or members.

HIM SS will not disc ha rge, demote, suspend, threaten, ha ra ss, or in a ny other manner d isc rimina te a ga inst employees who, in good faith, report suspected unethic al or illegal conduct.

### 4.6 Reporting Unethic al or Illegal Conduct

If you have a compliance orethicsquestion, orif you need to report a possible violation, there are ma ny resourcesto a ssist you. You may contact the Human Resources Dep artment or Legal Affa irs. You may also a c cessthe HIMSS C omplia nce Hotline at https://www.himss.ethic spoint.com should you wish to file an anonymous report.

Employees are encouraged to talkto managersorotherappropriate personnel, such a sthe Human Resources Department orLegal Affairs, when in doubt about the best course of action in a partic ularsituation or if you have a complia nce orethic squestion.

If you observe behaviorthat you believe maybeillegal or a violation of this Code or HIMSS policy, you a re required to report. If you believe you a re being a sked to partic ipate in something that is unethic alorillegal, refuse to do so a nd report the matter immed iately. Employees a re also expected to cooperate with internal investigations of a lleged misc onduct. HIMSS will not a llow a ny reta lia tory action a gainst employees that make good fa ith reportsorparticip ate in a ny internal investigations.

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### 4.7 Politic al Activities

All Employees have recognized rights to a ctively partic ipate in the political processas private citizens.

Asa non-profit organization, generally HIMSSdoes notengage in partisan policy a ctivitiessup porting or op posing candidatesfor public office, politic al parties, or policy a ction committees. HIMSS may, from time to time, engage in lobbying or other sup port that is related to its exempt purposes.

If you a re enga ging in personal politicalactivities, such cond uct must oc cur on your own time and at your own expense. When making public statements, politic al contributions, orengaging in a ny politic al a ctivities, you must make it clearthat you are acting asa privatecitizen and not asa representative of HIMSS.

## 5 Compliance Tips

All employees, officers, and directors have the responsibility to report observed or suspected violations of la w, this Code, HIM SS' polic ies and a ny activity that might constitute financial fra ud ormisconduct. We must all work togetherto ensure prompt a nd consistent a ction a ga inst potential violations of our ethic al resp onsibilities. However, not all situations a re clear-cut. Since we cannot a ntic ip ate every situation that will arise, it is important that we have a wayto approach a new question or problem. These a re the step sto keep in mind:

## 1. Make sure you have all the facts.

To reach the right solutions, we must be as fully informed aspossible.

## 2. Ask yourself: Whatspec ific ally am I being asked to do? Does it seem unethic al or improper?

This will enable you to focus on the specific question you are faced with and the alternativesa vailable. Use yourgood judgment and common sense; if something seems unethicalorimproper, it is best to make a report orseek guidance.

## 3. Disc uss the problem with your manager, Human Resourc es, or, for compliance issues with Legal Affairs.

This is the basic guid ance for all situations. In manycases, your ma na gerwill be more knowledgeable about the question a nd willappreciate being brought into the decision-ma king process. Rememberthat it is your ma na ger's resp onsibility to help solve problems. If you are uncomfortable discussing the problem with your ma na ger, you cantalk to Human Resources. If your question relates to a ny complia nce issues addressed in this Code, you cantalk to a nyone in LegalAffairs.

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## 4. Seek help from Company resources.

In a case where it ma y not be appropriate to discussan issue with your mana ger, you may contact the Vice Presid ent of Human Relationsat 312 915-9218 or Legal Affairs at 720-673-3807. A no nymous rep ortscan be made through the internet at https://www.himss.ethic spoint.com. You may a lso place an a nonymouscall by contacting the following numbers depending on the Country in which you a re located:

- United States 1-844-319-1610
- Germa ny 0-800-225-5288, at the English prompt dial 844-319-1610
- Singa p ore (StarHub) 800-001-0001 or (SingTel) 800-011-1111, at the English p rompt dial 844-319-1610
- Sp a in 900-99-0011, a t the English prompt dial 844-319-1610
- United Kingdom 0-800-89-0011, at the English p rompt dial 844-319-1610


## 5. You may report violations in confidence and without fear of retaliation.

If your situation requiresthat your id entity be kept secret, your a no nymity will be p rotected. HIM SS does not permit retaliation of a ny kind a ga inst emp loyees, offic ers or directorsforgood fa ith reports of suspected violations.

## 6. Always ask first, actlater.

If you a re unsure of what to do in a ny situation, seek guid a nce before you act.

## 7. All employees, offic ers, and directors are subject to the Code of

 Conduct, whic $h$ desc ribes procedures forthe intermal reporting of violations.All employees, officers, a nd directors must comply with those rep orting requirements and promote complia nce with them by others. Fa ilure to adhere to this Code by a ny employee, offic er, ordirector will result in disc ip lina ry action, up to a nd including termina tion.

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## 6 Additional Resources for Employees

### 6.1 HIMSS Compliance Hotline

All calls to the HIMSS C omplia nce Hotline a re a nswered by a n outside firm. Tra ined operatorswill respond 24 hoursa day, 7 daysa week. The toll-free numbersappear below. You may also file a report via the internet at https://www.himss.ethic spoint.com.

- United States 1-844-319-1610
- Germa ny 0-800-225-5288, at the English prompt dial 844-319-1610
- Singa pore (StarHub) 800-001-0001 or (SingTel) 800-011-1111, at the English prompt dial 844-319-1610
- Spain 900-99-0011, a t the Eng lish prompt dial 844-319-1610
- United Kingd om 0-800-89-0011, at the English prompt dial 844-319-1610

You can use the HIM SSC ompliance Hotline without fearof retaliation. Whether you call or use the internet, you may rema in a nonymous. In eithercase, calls will be a ddressed and you cancallbackto find out the statusoroutcome of the case.

Use of the hotline is an important tool fordetecting noncompliance. If you knowingly make a false report, it is a violation of ourpolicies and you maybe subject to disc ip lina ry a ction, up to a nd including termination.

### 6.2 How to Contact HIMSS Resources

Legal Affairs: Erin Sc hietinger
Telephone: (312) 505-3645
Ema il: erin.schietinger@himss.orq
Human Resources: J a nella Ka c zanko
Telephone: (312) 915-9218
Ema il: ja nella.kaczanko @himss.org

