



# Code of Conduct

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## **About Ethical Decision-Making**

Our Code of Conduct cannot anticipate every situation. If faced with a difficult ethical decision, ask yourself:

- Is it ethical?
- Is it legal?
- Is it consistent with this Code of Conduct?
- Is it consistent with our [Values](#)?
- Am I being truthful and honest?
- Will my decision reflect positively on JAX's reputation for integrity?
- Would I feel comfortable if my decision were reported in the news, through social media, or to someone I respect?

If you are uncertain, you can and should seek guidance from:

- Your direct supervisor or your department leaders
- The JAX [Legal Department](#)
- The JAX Anonymous Reporting Hotline
  - Phone: 833-207-6126
  - Web: <https://jax.ethicspoint.com>

The JAX Anonymous Reporting Hotline is available for use by all JAX employees, students, scientists, trustees, collaborators, vendors, and customers. Anyone with a question or concern about acting with integrity at JAX is encouraged to voice their questions or concerns, including by contacting the JAX Anonymous Reporting Hotline, which allows for anonymous reporting.

## **Doing the Right Thing**

**Q:** *I have questions about whether a proposed activity complies with JAX policies, but I am worried my supervisor will assume I don't know how to perform my job if I ask. What should I do?*

**A:** *Supervisors are expected to foster an environment that encourages employees to raise questions. If you have a question, it's your responsibility and our expectation that you'll ask it and that your supervisor will answer it.*

## **Further Guidance**

[JAX Values](#)

## **Your Individual Responsibility and How to Raise Concerns**

### **Individual Responsibility**

Everyone at JAX has a responsibility to comply with the law, JAX policies, and the Code of Conduct. In addition, each employee has a responsibility to report known or suspected violations of the law, JAX policies or the Code of Conduct to their supervisor, the [Legal Department](#) or the [JAX Anonymous Reporting Hotline](#). If you are aware of a violation, you must report it.

At JAX, all reports will be given serious consideration, and each employee has the responsibility to make reports honestly and in good faith. If you believe that a report by you has been given insufficient attention, you must report the matter to higher levels of management or the [JAX Anonymous Reporting Hotline](#).

### **Anonymity and Confidentiality**

Our [JAX Anonymous Reporting Hotline](#) may be used anonymously to report known or suspected violations of the law, JAX policies or the Code of Conduct. Whether you report to management or use the [JAX Anonymous Reporting Hotline](#), we will make every effort to treat reports confidentially, consistent with our duty to investigate, take corrective action and fulfill our legal obligations.

### **Non-Retaliation Policy**

JAX does not tolerate any form of retaliation or intimidation against any employee who makes a good faith report of a suspected violation or participates in good faith in any investigation of a suspected violation.

Nevertheless, reports should only be made honestly and in good faith, and an employee who knowingly makes a false accusation may be subject to disciplinary action.

### **Consequences of Misconduct**

Employees who fail to comply with JAX policies or the Code of Conduct may be subject to disciplinary action, up to and including termination of employment. Disciplinary action may also be taken against supervisors who fail to adequately address misconduct.

Failure to cooperate with an investigation may also subject employees to disciplinary action, up to and including termination of employment.

### **Doing the Right Thing**

***Q:** I have felt that my boss who is a senior researcher has made sexual overtures to me and I've also heard rumors about their past behavior. A colleague in my department told me it is pointless to raise the issue and did not feel that concerns about an important leader at JAX will be addressed.*

***A:** You should raise your concern with [Human Resources](#), the [Legal Department](#) or you can report anonymously to the [JAX Anonymous Reporting Hotline](#). JAX is committed to thorough investigations and taking appropriate disciplinary action, no matter the level of the employee. JAX takes sexual harassment very seriously in all cases.*

### **Further Guidance**

[Whistleblower Protection](#)

[Anti-Violence/Anti-Harassment](#)

## **How We Conduct Our Research and Promote Animal Welfare**

### **Animal Welfare**

We are committed to the humane and ethical treatment of animals under our care. You must:

- Comply with federal, state and local guidelines and regulations related to the humane and ethical treatment of animals under your care.
- Complete training on the humane and ethical treatment of animals under your care.
- Support the development and adoption of measures to reduce, replace or refine the use of animal testing.
- Report any concerns about the treatment, misuse or abuse of animals under our care in accordance with JAX Policy (see further guidance). You may also make a report to the [JAX Anonymous Reporting Hotline](#).

### **Research Conduct**

We are committed to the highest ethical and scientific standards in our research activities. We are also committed to the safety and protection of our research subjects. You must:

- Comply with JAX policies and applicable laws and regulations designed to ensure the health, well-being, and safety of research participants.
- Ensure that investigators are trained on study protocols and scientific and ethics standards.
- Maintain the integrity and quality of research and laboratory results, data and records and follow applicable federal grant regulations.
- Report research misconduct to the Senior Vice President for Research, who is our [Research Integrity Officer](#), or the [JAX Anonymous Reporting Hotline](#).

### **Biosecurity and Quality**

We are committed to preventing the contamination of animals under our care and to instilling quality in every action. You must:

- Follow JAX policies to maintain barrier rooms and ensure quality.
- Use protective clothing and equipment and undertake proactive actions to prevent contamination.
- Identify and prevent practices that could impact quality and take corrective actions.
- Report any concerns to your supervisor, the [Institutional Officer](#), or the [JAX Anonymous Reporting Hotline](#).

### **Doing the Right Thing**

***Q:** I have generated a significant amount of data in the course of a JAX research project that has just been completed. Can I simply dispose of the data now that the project is finished?*

***A:** No. Research data must be disposed of or archived in accordance with study protocols as well as our data and document retention policies and procedures. You should work with your supervisor and IT to ensure your data is disposed of or archived as appropriate.*

### **Further Guidance**

[Notification and Evaluation of Animal Welfare Concerns](#)

[Record Retention](#)

[Human Subjects Research: Recordkeeping and Records Retention](#)

[Human Subjects in Research: Data and Safety Monitoring Plans](#)

[Recruitment of Research Subjects](#)

## **Our Work Environment & Expectations**

### **Our Work Environment**

We are committed to our diverse workforce through a culture of inclusion and mutual respect. You must:

- Comply with JAX anti-harassment policies.
- Not engage in or encourage action that creates an intimidating, hostile, or unprofessional work environment.
- Follow applicable federal, state, and local laws on unlawful discrimination.
- Not discriminate based on race, color, religion, sex, sexual orientation, gender identity, national origin, ancestry, age, disability, genetic information, veteran status, military status, marital status, citizenship, or any other status protected by applicable law.
- Discourage and report comments or activities that are unprofessional, offensive, derogatory, bullying, discriminating, or harassing.

### **A Safe and Healthy and Drug Free Workplace**

We have a responsibility to maintain safe work areas. Violence in the workplace will not be tolerated. You must:

- Complete safety training and follow safety and security policies.
- Promptly report safety concerns or threatening or violent behavior.
- Never perform work while intoxicated or under the influence of illegal drugs or controlled substances.
- Not possess, distribute, sell, or consume illegal drugs or controlled substances.
- Not possess firearms in the workplace, unless permitted by law and in accordance with JAX's Firearms Policy.

### **Stewardship of Property and Funds**

As employees of a nonprofit organization, we are stewards of JAX property and funds, with a responsibility to contributors and donors to JAX, including federal and state governments. You must:

- Avoid waste and improper use of JAX property and funds.
- Never use JAX property and funds for personal benefit or the benefit of a third-party organization without proper approval.
- Use JAX property responsibly and consistent with the JAX's non-profit, tax-exempt status and its research and educational mission.

### **Doing the Right Thing**

***Q:** One of my co-workers emailed an inappropriate joke along with explicit images. I found it offensive but don't know if I should raise my concerns with my co-worker.*

***A:** We have an obligation to treat each other with respect and offensive behavior such as this is not acceptable. Our information systems and devices should only be used for appropriate purposes. If you are uncomfortable speaking with your co-worker directly, contact your supervisor, [Human Resources](#), the [Legal Department](#) or the [JAX Helpline](#).*

### **Further Guidance**

[Anti-Violence/Anti-Harassment](#)

[Student Sexual Misconduct Policy \(Title IX\)](#)

[Drug and Alcohol Policy](#)

[Weapons in the Workplace](#)

## **Our Work Environment & Expectations (Continued)**

### **Conflicts of Interest**

We have a responsibility to act in the best interest of JAX. A conflict of interest could arise if the prospect of personal gain may, or may appear to, improperly influence your ability to act in JAX's best interest. Conflicts of interest must be disclosed to ensure proper management. You must:

- Disclose outside activities, consulting relationships and financial interests that may present actual or potential conflicts of interest to your supervisor and in accordance with the conflicts of interest policies.
- Follow JAX policies related to the disclosure and review of financial or non-financial interests (including those of family members) in sponsored research.
- Only accept a position as a board member of any organization after consultation with your supervisor and in accordance with JAX's conflicts of interest policies.
- Not conduct business on behalf of JAX with family members or others with whom you have a close personal relationship without prior written approval.
- Not use JAX resources for your personal benefit or the benefit of someone else.

### **Giving and Accepting Gifts**

We only give or accept gifts or entertainment to or from current or potential vendors, suppliers, customers, or other associates consistent with JAX policy and applicable law. You must:

- Comply with JAX's Gifts and Entertainment Policy, which requires that gifts and entertainment are never given or accepted to improperly influence the recipient.
- Never give or accept cash or a cash equivalent gift.
- Only give or accept reasonable and reciprocal entertainment that is consistent with social and business customs.
- Only give or accept gifts or entertainment when appropriate and legal in the relevant location.
- Never provide a gift -- including meals, entertainment, or other items of value -- to U.S. or foreign government officials unless approved consistent with JAX policy. See Anti-Corruption and Anti-Bribery Laws, [below](#).

### **Doing the Right Thing**

***Q:** I receive compensation for serving on the advisory board of an organization that will be directly impacted by the results of my new research project. I'm worried that if I report my advisory board activities, I'll be told I have to resign from the advisory board in order to continue with the new research project because conflicts of interest are not permitted.*

***A:** While conflicts of interest of interest should be avoided when possible, we have procedures in place that allow us to evaluate potential conflicts of interest and implement plans to ensure proper management of conflicts. You must disclose the conflict and work with the Research Integrity Officer to determine the appropriate course of action.*

### **Further Guidance**

[Conflicts of Interest](#)

[Legal Department](#)

[Anti-Corruption Compliance](#)



## **How We Interact with Government and How We Operate**

### **Antitrust and Unfair Competition**

Antitrust and competition laws are designed to preserve fair competition and may vary from state to state and among countries. You must:

- Not engage in discussions or enter into an agreement with a competitor regarding prices, strategic plans, terms or conditions of sale, production or distribution, or allocation of products, territories, markets or customers.
- Not engage in discussions with competitors regarding boycotts or other joint behavior towards customers, suppliers or other competitors.
- Not disclose proprietary or confidential information to competitors or in violation of JAX policies.
- Consult the [Legal Department](#) prior to engaging in any activity that may raise antitrust or unfair competition concerns.

### **Anti-Corruption and Anti-Bribery Laws**

We do not offer or accept bribes in any form and prohibit bribery in our interactions with government officials and private parties. You must:

- Not give, offer or promise anything of value to influence a government official or a person's actions or to enhance JAX's interests.
- Take appropriate steps to ensure that any payments, benefits, or transfers of value are accurately reflected in our financial records.
- Take appropriate steps to ensure that any business courtesies and gifts offered or accepted are of nominal value by local standards and only offered or accepted consistent with JAX policies.
- Take appropriate steps to ensure that any third parties acting on behalf of JAX adhere to JAX's anti-bribery policy, including any interactions with government officials.

### **Cooperation with Investigations, Lawsuits and Regulatory Inspections**

We are committed to cooperating with government inspections and investigations and take private lawsuits seriously.

- If you receive a notice of a government investigation or a private lawsuit or a subpoena, immediately report it to the [Legal Department](#) and follow their instructions regarding any response.
- Coordinate with JAX experts in response to regulatory inspections and requests and always provide regulators with accurate and responsive information.

### **Doing the Right Thing**

***Q:** I have a new project on which I'd like to collaborate with a faculty member at the University of Connecticut. Since we haven't worked together before, I'd like to take them to lunch so that we can discuss the project and get to know each other better. Can I buy the faculty member lunch?*

***A:** No. Under anti-bribery laws, the University of Connecticut faculty member is considered a government official and you are prohibited from paying for their lunch. You may still collaborate with the faculty member and discuss the project over lunch, but you may not pay for their meal.*

\*\*\*\*\*

***Q:** I received a letter from a government lawyer saying that JAX has to provide information to them by a certain date. The letter came while I was on vacation and now the information is due today. Should I send the information right away, or at least call to explain the delay to make sure JAX is compliant?*

***A:** No. You should contact the Legal Department immediately and provide them with a copy of the letter. You should wait to receive guidance from the Legal Department before responding to the letter in any way.*

### **Further Guidance**

[Legal Department](#)

[Anti-Corruption Compliance](#)



## **How We Interact with Government and How We Operate (Continued)**

### **Global Trade**

We comply with laws, regulations, sanctions and restrictions related to the import, export, and transfer of information, technical data, materials, goods and funds. You must:

- Understand and comply with trade laws and restrictions associated with the countries with whom we interact.
- Not cooperate with restrictive trade practices or boycotts prohibited under law.
- Consult with the [Legal Department](#) prior to hosting or collaborating with foreign researchers or entities or travelling to international conferences to present unpublished research results.
- Take appropriate steps to ensure that any information furnished to customs officials or anyone else engaged in facilitating imports or exports is truthful and accurate.

### **Financial Integrity**

The reliability and accuracy of our financial information is critical to preserving our reputation and integrity. You must:

- Follow proper accounting practices for record keeping and financial reporting.
- Never provide false, misleading, or incomplete information to anyone who is preparing or conducting an audit and cooperate with our auditors.
- Take appropriate steps to ensure that all transactions are correctly and properly recorded.
- Take appropriate steps to ensure that all travel and entertainment expenses are reasonable, substantiated and approved as required by JAX policies.

### **Business Records and Information**

The accuracy and quality of our business records directly impacts our financial, regulatory, contractual, and legal obligations. You must:

- Be knowledgeable of how data and records management policies apply to your responsibilities.
- Retain all data and records for the time period specified by applicable laws and JAX policies.
- Take special care to retain required data and documents if you receive a document retention letter.
- Never create, conceal, alter or destroy records related to an imminent or ongoing investigation, lawsuit or inquiry.

### **Doing the Right Thing**

*Q: How do export control regulations affect our collaboration with foreign national researchers?*

*A: In addition to shipments of a commodity, export regulations control the transfer, release, or disclosure of certain technical data to foreign persons working in the United States. The “deemed export” regulation states that a license is required prior to transfer of specifically listed technology, or technical data to a foreign person because even though the technology or data has not left the United States it is “deemed” an export to the home country of the foreign person.*

### **Further Guidance**

[Legal Department](#)

[Anti-Corruption Compliance](#)

[Export Control Policy](#)

## **How We Interact with Government and How We Operate (Continued)**

### **Confidential Information and Intellectual Property**

Some of our most valuable assets are our intellectual property and confidential information. You must:

- Identify and protect our intellectual property and comply with our [Confidentiality and Nondisclosure Policy](#) during and after your employment with JAX.
- Not violate the intellectual property rights of third parties or improperly use or disclose confidential information of third parties.
- Disclose inventions belonging to JAX through the [Invention Disclosure Form](#) process.
- Not post any information about JAX or our customers on social media unless permitted and approved in accordance with JAX policies.

### **Privacy and Security of Personal Information**

We maintain the trust of our employees, students, customers, collaborators and research subjects as well as the scientific community by safeguarding their confidential personal information. You must:

- Avoid collecting, using or accessing the personal information of others unless you have a legitimate business purpose and authority to access the information.
- Comply with applicable privacy laws and regulations.
- Ensure that personal information is appropriately secured as required by JAX policies and applicable laws.
- Only disclose confidential information to third parties who have a legitimate need for the information and that have appropriate safeguards in place, and in accordance with JAX policies.
- Immediately report any actual or potential loss or unauthorized disclosure of personal information to the Chief Information Security Officer or the [JAX Anonymous Reporting Hotline](#).
- Promptly report phishing schemes seeking personal information or attempting to perpetuate fraud to the Chief Information Security Officer.

### **Doing the Right Thing**

***Q:** When should I consider intellectual property protection for a new idea?*

***A:** Involve the [Legal Department](#) as early as possible. Waiting until a research collaboration is underway or an invention, idea or publication has been revealed to the public or disseminated without appropriate protection can jeopardize our ability to safeguard our intellectual property and confidential information. Without these protections in place, you may not receive the recognition you deserve, and you and JAX could lose the right to utilize the idea in your research, restricting your freedom to operate.*

### **Further Guidance**

[Information Security and Privacy](#)

## **How We Interact with Government and How We Operate (Continued)**

### **Political Activity**

As an independent non-profit biomedical research institution, we are subject to laws and regulations governing political activities, including charitable contributions and lobbying.

- No employee may lobby on behalf of JAX without authorization, and any communications with government officials should be coordinated with the VP for External and Government Affairs.
- Federal funds and grant money may never be used for lobbying.
- Private foundation funds may not be used for lobbying if the foundation prohibits such use.
- Campaign contributions can never be made on behalf of JAX.
- Personal contributions must comply with federal, state, and local laws, which oftentimes impose strict limitations on personal contributions, and special rules may apply because of JAX's status as a non-profit and a government contractor. You must contact the VP for External and Government Affairs in advance of making a campaign contribution if you are uncertain it is proper under the law.
- No person engaged in political activities may use JAX resources or facilities, including email, for their personal political activities.
- Employees engaging in personal political activities should clearly indicate that their positions are their own and they are not acting on behalf of JAX or in their official capacity.

### **Public Relations & Social Media**

We are committed to providing accurate and reliable information to the media and members of the public. You must:

- Not respond directly to media queries. Instead, direct or forward any media inquiries to the Communications [and Marketing](#) who will help in handling the media request.
- Not provide any information about JAX to outside sources without appropriate authorization.
- Receive approval from Communications and Marketing for social media activities on behalf of JAX.
- Clearly identify personal social media activities as your personal activity and not action on behalf of JAX.

**The success and reputation of JAX depends on the integrity of the entire JAX community. Accordingly, employees, students, scientists, trustees, collaborators and contractors must comply with the law, JAX policies and the Code of Conduct, and any actual or suspected violations must be reported. If you have questions, are uncertain about a potential decision, or need to report an actual or suspected violation, please talk to your supervisor or contact the [Legal Department](#) or the [JAX Anonymous Reporting Hotline](#).**

### **Doing the Right Thing**

***Q:** A close family friend is running for local office in our town, and I intend to write a letter of support for the candidate. The letter will be from me personally, but I'd like to put it on JAX letterhead so that the recipients can see I am an important community member. Is this OK to do?*

***A:** No. You may not use JAX letterhead or any other JAX resources when you engage in personal political activity because it can give the appearance that JAX is endorsing a candidate or otherwise engaging in prohibited political activity.*

### **Further Guidance**

[Political Activity Policy](#)

[Public Data and Digital Communications Policy](#)