

## **Ethics Rules and Policies of the American Red Cross**

### **American Red Cross Business Funds, Property, and Time**

How we use Red Cross funds, property and time directly impacts our economic stewardship. We must use these valuable assets with care, protecting them against misuse or theft.

**Red Cross Business Funds** includes donations, cash, checks, postage, charge cards, bills, vouchers, and reimbursement claims. We should ensure that all claims vouchers, bills, and invoices are accurate and proper.

**Red Cross Property** is used to conduct Red Cross business. Employees and volunteers are expected to behave responsibly and exercise good judgment when using Red Cross property.

**Red Cross Time** is that time when we are assigned to work or are traveling on Red Cross business. This also means that when we are assigned to work, we will not allow outside interests to interfere with our job responsibilities.

### **Antitrust and Insider Trading**

#### **Antitrust**

Antitrust and competition laws protect free enterprise. These laws prohibit agreements and practices that reduce competition, such as price-fixing and boycotting suppliers or customers. We should avoid creating even the appearance of an improper agreement or understanding by keeping communications with our competitors to a minimum and ensuring there is a legitimate business reason for all such communications.

#### **Insider Trading**

In the course of your employment or volunteer service with the Red Cross, you may have access to insider information concerning the Red Cross or other companies. You should not use this information for your own financial benefit. Insider information is defined as material, confidential (nonpublic) information that you learn through your job. Insider trading is the illegal use of inside information. You cannot use information gained through the Red Cross to buy or sell securities of another business. Nor can you give inside information to anyone else so they can trade. This rule applies no matter where you live or where the receiver of the information lives. Examples that would apply to the Red Cross are: anticipated acquisitions; regulatory approvals; joint ventures; product launch dates; the progress of clinical, field, or safety trials; and licensing agreements. Notify your supervisor or the Office of the General Counsel if you have any questions or if you learn of any possible misuse of material non-public information.

See [Human Resources Policy and Procedure](#).

### **Armed Forces Emergency Services Standards of Behavior**

Volunteers and employees working within the Armed Forces Emergency Services ("AFES") must comply with the standards of behavior that are expected of members of the U.S. armed forces. All AFES mobile staff must follow the requirements established in the "Deployed Armed Forces Emergency Mobile Staff Standards of Behavior Agreement," a copy of which is available from Human Resources Administration or the AFES Station Guide.

## **Biomedical Services Policies**

### **Human Subjects Research Policies and Procedures**

Biomedical Services has established written policies and procedures regarding regulatory and ethical issues related to the use of human subjects in research. Please note that there have been significant changes to the policies and procedures since they were issued on July 1, 1999. For a copy of these policies and procedures, contact Julia Codell, Holland Laboratory, at (301) 738-0630; [codellj@usa.redcross.org](mailto:codellj@usa.redcross.org).

Biomedical Services has established a written policy for reporting unsafe or unlawful workplace conditions or actions. A copy of this policy is given to all volunteers and employees in Biomedical Services at the time of hire.

Report any action or condition in the workplace that you believe is unsafe or may violate applicable safety laws, regulations or directives to:

- Your immediate supervisor, or
- The Quality Assurance Officer, General Manager or Director of the facility in which you work, or
- The National Head, Tissue Services.

See [National Headquarters Management Letter #95-29, dated August 14, 1995](#).

### **Holland Laboratory Scientific Staff Consulting Agreements**

Red Cross scientists are permitted to provide consulting services to industry, government and academic institutions and to receive compensation for such services.

Providing consulting services to these groups gives a scientist the opportunity to broaden his or her experience, to interact with leading scientists and to have access to talent, reagents and data that strengthens overall scientific productivity.

All scientific staff members are required to sign an "Addendum to the American Red Cross Code of Conduct," which sets forth certain requirements related to consulting agreements signed by Red Cross employees.

For further information, please contact your supervisor or the Vice President of Research and Development.

See [Addendum to Code of Conduct](#).

### **Honoraria**

Red Cross scientists and researchers may accept an appropriate fee for delivering a speech or paper or serving on a review panel. The fee can be accepted if it is consistent with your level of activity, energy expended and time invested in the project. If the amount offered is excessively large, contact the Vice President of Research and Development prior to accepting it.

You are not required to contribute such honoraria to the Red Cross. In addition, you may accept travel and maintenance or the waiver of registration fees as a token of appreciation for your contribution to a symposia or conference.

See [Honoraria Policy](#).

### **Misconduct in Science**

Red Cross has established procedures to detect, investigate and resolve any allegations of scientific misconduct. These procedures are designed to protect the individual rights of both the accused and the accuser. If you have any questions regarding these procedures, contact the Vice President of Research and Development.

See [Misconduct in Science Policy](#).

### **NIH and NSF Grant Applications**

Holland Laboratory guidelines must be followed for all National Institutes of Health (NIH) and National Science Foundation (NSF) grant applications by Holland Laboratory scientists. These guidelines are designed to avoid conflicts of interest that may arise in connection with NIH and NSF grants and contracts. If you have any questions, contact the Vice President of Research or the Senior Vice President of Biomedical Services. See [NIH and NSF Grant Applications](#).

### **Research Ethics**

The Holland Laboratory offers a research ethics program each spring. The sessions offer an opportunity for all scientific staff to consider specific areas of professional ethics in research. For further information, contact Donna Sobieski, Holland Laboratory, at (301) 738-0575; [sobieski@usa.redcross.org](mailto:sobieski@usa.redcross.org).

### **Compliance with the Law**

The Red Cross will conduct business in accordance with all applicable laws and regulations. Compliance with the law does not comprise our entire responsibility, but rather it is a minimum, absolutely essential condition for the performance of our duties.

### **Confidentiality**

The products, services, ideas, concepts and other information we produce are important proprietary assets for the Red Cross. Various laws enable us to protect these valuable assets. It is in the best interest of the Red Cross to prevent inappropriate or unauthorized disclosure of confidential information.

### **Conflicts of Interest**

In the course of your job at the Red Cross, there may be times when your personal interests conflict, or could appear to conflict, with the best interests of the Red Cross. If you believe you are in such a situation, you should speak to your supervisor or the chairperson of your local governing board to develop an appropriate resolution. In many instances, you will be able to resolve the conflict of interest if you identify the conflict, disclose it to your supervisor or chairman and withdraw yourself from discussions and decisions relating to the situation.

### **Common Types of Conflicts of Interest**

#### **Financial Investments**

Owning a financial interest in a company that does business with the Red Cross can create a conflict of interest. If you have any question as to whether a conflict of interest exists, or what course of action you should take, contact the Office of the General Counsel. See [Human Resources Policy and Procedure](#).

#### **Conflicts Arising from Personal Relationships**

If your spouse, any member of your immediate family or someone else with whom you have a close relationship owns or works for a competitor or supplier of the Red Cross, you should be particularly careful with security, confidentiality and potential conflicts of interest.

**Example:** You are a chapter manager and your husband owns a company that sells supplies to the chapter - you have a potential conflict of interest. It could look like your decision to buy supplies from that company is based on your personal interest and not because it's the best deal for Red Cross.

See [Human Resources Policy and Procedure](#).

### **Conflicts Arising from Affiliation with Other Organizations**

If you serve as a director or officer of an organization that is a supplier, purchaser or competitor of the Red Cross, you could easily find yourself in a conflict of interest situation. If you serve as a director or officer of such an organization, you should consult the Office of the General Counsel or the Ethics Officer to determine whether a conflict of interest exists and whether there is an appropriate resolution.

### **Conflicts Arising from Working with a Spouse, Partner or Family Member**

Because of the strong potential for a conflict of interest, you should not supervise or be in a position to influence the hiring, work assignments or assessment of someone with whom you have a close personal relationship.

**Example:** The spouse or partner of a chapter executive director should not be on the chapter's governing board.

See [Human Resources Policy and Procedure; HR Policy Manual 501.01](#).

### **Environmental Protection**

The Red Cross is committed to protecting the environment and the health and safety of people. To accomplish this, we have made local environmental and health and safety regulations our minimum standard for environmental protection. The Red Cross requires employees and volunteers to participate actively in local environmental programs, follow specified procedures and notify management of situations that are potentially damaging to the environment. We will conserve natural resources and prevent pollution by reducing waste, reusing and recycling materials, and disposing of all hazardous and other waste in a legal, safe, and responsible manner.

### **Gifts**

Fair decisions are best made when there is no conflict of interest or appearance of preferential treatment. In business situations, the acceptance of a gift can make it appear as if a favor was used to influence the recipient's judgment. To avoid any appearance of favoritism, you should never accept a present, gift, gratuity, hospitality or favor (that is of more than nominal value) from persons or firms with whom the Red Cross has or could have a relationship.

### **Influencing Contracts or Allocation of Business**

If part of your job is to award contracts or if you can influence the allocation of business, you must be particularly careful to avoid any appearance of favoritism.

Do not accept any gift from a supplier or consultant if:

- You are in the process of selecting or extending a contract with the supplier or consultant, or
- Acceptance of the gift could give the impression that offering gifts is a way to obtain Red Cross business.

### **Acceptable Gifts**

You may accept gifts of nominal value, provided that you:

- Avoid a pattern of accepting frequent gifts from the same person or company.
- Do not accept any gift that you would feel uncomfortable discussing with your manager, co-workers or a newspaper reporter.
- Do not accept a gift if it could give the appearance of favoritism or influence or adversely affect the Red Cross reputation for impartiality and fair dealing.

### **Examples of Gifts of Nominal Value**

- Novelty, advertising or promotional items, such as calendars, pens or mugs.
- Fruit baskets, flowers and other modest presents that commemorate a special occasion.
- Infrequent meals and entertainment that are shared with the person who has offered to pay for it, provided that you decline meals or entertainment that are excessive or inappropriately lavish.

### **Refusing a Gift**

If you cannot accept a gift offered to you, politely refuse and explain that our policy prohibits accepting it. If appropriate, you can suggest that the gift be donated to the Red Cross, provided that the donation is not specifically earmarked for your use or the use of your department.

### **Soliciting Gifts**

You should never solicit donations of goods or services from current or potential vendors, suppliers or consultants, unless:

- The supplier or consultant is informed that the donation will have no effect on its business relationship with the Red Cross, and
- You have no influence over the allocation of business to the supplier or consultant.

**Example:** If your office is having an outing, you should not ask one of your vendors to donate beverages for the outing.

### **Health and Safety**

The Red Cross is committed to providing all employees and others who are on our property with a safe and secure environment. Accordingly, we will comply with health and safety laws and regulations, as well as with Red Cross policies governing health and safety. Remember that you have an individual responsibility for safety and should report any concerns to your manager.

### **Intellectual Property**

**NOTE:** THIS POLICY HAS BEEN REVISED WITH RESPECT TO BIOMEDICAL INVENTIONS. IF YOU HAVE ANY QUESTIONS REGARDING INTELLECTUAL PROPERTY RELATING TO BIOMEDICAL INVENTIONS, PLEASE CONTACT THE OFFICE OF GENERAL COUNSEL.

The Red Cross owns all inventions, discoveries, know-how and all literary and other intellectual property created or developed by you in the course of your employment or service with the Red Cross. All volunteers, employees and agents doing creative work for the Red Cross are required to sign a Confidential Information and Intellectual Property Agreement, which describes your responsibilities and obligations regarding intellectual property. You are also expected to adhere to all applicable federal, state and foreign laws concerning intellectual property rights, including the use of copyrighted software and other computer-related materials.

Report any suspected violations of the intellectual property policy to your supervisor and the Office of General Counsel.

See [Legal Resources Manual, Chapter 9](#); [Human Resources Policy and Procedure](#); [BoG Policy Manual, Part 1, Section 3.2.2](#).

### **International Business**

The Red Cross is committed to conducting its activities free from the unfair influence of bribery and to foster anti-corruption awareness among its employees and business relations throughout the world. The Foreign Corrupt Practices Act (FCPA) is a United States law that prohibits corruptly giving, offering or

promising anything of value to foreign officials or foreign political parties, party officials, or candidates for the purpose of influencing them to misuse their capacity to obtain, keep or direct business or to gain any improper advantage. The Red Cross will know and follow the law when involved international business.

### **Internet/Intranet/Computer Usage Policy**

When you access the Internet or send e-mail through Red Cross systems, whether from your office or from home, you automatically include your Red Cross address. Because you will be identified with the Red Cross whenever you go on the Internet, you should not participate in any activities that could damage the image of the Red Cross. Do not transmit or access any information and/or other material over the Internet that is fraudulent, harassing or obscene or which violates any other Red Cross policies (such as the Code of Conduct). Use all computer software according to applicable government laws and licensing requirements. Do not make unauthorized copies of legally protected software. Downloading or installing unauthorized software jeopardizes our computer systems and is not allowed. No software should be loaded on Red Cross computers without authorization from the IT department.

If you have any questions concerning Red Cross internet/intranet usage policy, please contact Andrea Morisi, Senior Counsel, Office of the General Counsel.

See [Internet/Intranet Usage Policy](#).

### **Media and Public Inquiries**

The Red Cross is committed to accurate and reliable information to the media and to the American public. All public disclosures, press releases, speeches and other communications will be honest, accurate, timely and representative of the facts. To ensure the consistent and accurate delivery of Red Cross information, we will promptly forward all media and other external organization requests for information to the Communication and Marketing Department.

### **Maintain Red Cross Neutrality**

The Fundamental Principle of Neutrality means that the Red Cross does not become involved in any controversies of a religious, political, racial, or ideological nature. In particular, the Red Cross does not take sides or engage in any political campaigns. Because some of us at the Red Cross, in our capacity as private citizens, do take an active interest in politics and campaigns, we must be careful not to inadvertently compromise the Red Cross reputation for neutrality.

How can we prevent our private actions from compromising the principle of neutrality? All volunteers and paid staff who participate in political campaigns and other political events must do so on their own time and should not use their Red Cross affiliation in connection with these activities. If you are a senior-level employee, you should not hold any political position that could create the appearance that the Red Cross is not completely neutral with respect to governmental affairs.

Below are examples of actions that could harm the Red Cross reputation for neutrality:

- At a local campaign event, the chief executive officer of a chapter or Blood Services region welcomes and introduces a Presidential candidate.
- A Red Cross volunteer wears a jacket with the Red Cross logo while collecting signatures for a political campaign.
- In her campaign for mayor, a chapter or Blood Services region board member distributes a photograph of herself standing in front of the Red Cross building.

- A staff member who is also a campaign volunteer receives phone calls regarding campaign business at his Red Cross office.

Any situations like the ones described above should be avoided. If you have any questions about whether an activity could compromise our organization's reputation for neutrality, please talk to your supervisor, or contact the Ethics Officer (202) 303-4090, or [ethics@usa.redcross.org](mailto:ethics@usa.redcross.org).

### **Record Keeping**

Every employee and volunteer must ensure that the reporting of business information – whether computerized, on paper, or in any form – is accurate, honest, timely, and which represents the facts fairly. We will adhere to all laws, regulations, external accounting controls, and Red Cross policies and procedures for implementing and reporting business transactions. We will never create a false or misleading report or record by deliberately or negligently making false entries or failing to make correct entries.

### **Regulatory**

A top priority of the American Red Cross is ensuring the safety, security, and availability of nearly half of the nation's blood supply. The Red Cross shares with the U.S. Food and Drug Administration (FDA) a steadfast commitment to this mission. If you suspect that someone has not complied with regulatory or Consent Decree requirements, call the Biomedical Regulatory Hotline (BRL) at 1-800-741-4738. This line should be used when the caller is reporting a concern regarding the collection, manufacturing, processing, distribution, or utilization of blood, blood components or tissue. Examples of concerns to be reported on the BRL are violations of regulations (FDA, OSHA, etc.), falsification, training issues, quality failures and Biomedical Services computer and equipment issues. If the caller is reporting other issues, they should call the Concern Connection Line (CCL) at 1-888-309-9679

### **Retaliation**

Retaliation against an employee who seeks advice, raises a claim or concern or reports misconduct is strictly prohibited and will not be tolerated. The Red Cross will take the appropriate action against any individuals engaging in retaliatory conduct against an employee who has truthfully, and in good faith, reported a violation. If you suspect that you, or someone you know have been retaliated against for making a report, you should immediately contact the Compliance and Ethics Officer.

## **Works About September 11 By Red Cross Volunteers And Employers**

### **Purpose**

Many American Red Cross volunteers and employees had extraordinary experiences while responding to the events of September 11, 2001. Many of these volunteers and employees have written or will write books about these experiences. Due to the special relationship among the American Red Cross, its volunteers and employees and the public we serve, it is important that the American Red Cross remind our volunteers and employees of (1) the public trust enjoyed by the American Red Cross, and (2) the obligations held by our volunteers and employees with respect to their relationship with the American Red Cross and its clients. As a result, the American Red Cross desires a uniform policy by which volunteers and employees will abide when creating, marketing and selling books and other literary works relating to the events of September 11, 2001.

### **Policy**

Volunteers and employees creating books and other literary works relating to the events of September

11, 2001 ("Authors") are reminded that Authors are bound by the American Red Cross Code of Conduct. Under the Code of Conduct, all Authors are prohibited from (a) accepting or seeking financial gain as a result of the Author's affiliation with the American Red Cross, (b) disclosing any confidential information that is available as a result of the Author's affiliation with the American Red Cross and (c) engaging in any activity that is contrary to the best interests of the American Red Cross. Further, all volunteers and employees must adhere to the American Red Cross Board of Governors' Confidentiality Policy, which may be found in Section 1.6 of the Board of Governors Policy Manual, Part One. Authors are strongly urged to review their ethical obligations to the American Red Cross and the clients of the American Red Cross in light of the Code of Conduct and corporate policy. Authors may find both the Code of Conduct and the Ethics Rules and Policies on Crossnet's "Resources For Every Red Cross Unit" under "Tap Legal & Ethics Resources" and the Board of Governors Policy Manual, Part One, is available under "Understand Our Governance."

The American Red Cross is very concerned about the potential for Authors to breach confidentiality obligations that both volunteers and employees have toward clients of the American Red Cross. To respect the confidentiality of American Red Cross clients, under no circumstances should Authors use names or identifying characteristics of any clients served during the events or aftermath of September 11, 2001. The American Red Cross will work diligently and take any necessary legal action to prevent these and any other breaches of confidentiality.

The American Red Cross is making a concerted effort to prevent, prepare for and respond to future disasters. The American Red Cross does not have the mission, staff or resources to facilitate each Author's creation, marketing and sale of the books and other literary works relating to the events of September 11, 2001. For these reasons, the American Red Cross will not endorse, authorize or sponsor any such books or literary works, nor will the American Red Cross authorize the use of the American Red Cross name or emblem to promote and/or market these books and other literary works.

Furthermore, the American Red Cross requests that all Authors prominently display the following language in their book or other literary work: This book is not sponsored, endorsed or authorized by the American Red Cross.

Due to the focus of the American Red Cross on the future, coupled with the current demands on the American Red Cross staff and the overwhelming number of requests from Authors, the American Red Cross will not assist Authors in creating, marketing or selling their books.

It is well established that the American Red Cross is no longer actively soliciting funds for the September 11, 2001 Liberty Fund. For this reason, Authors are not authorized to solicit funds for the Liberty Fund. While it is ultimately the Author's decision whether to donate to the American Red Cross some or all of the proceeds from the sale of the book or other literary work, Authors who wish to donate proceeds to the American Red Cross are encouraged to direct their donations to the general Disaster Relief Fund or their local American Red Cross chapter. Even if the Author decides to donate proceeds to the American Red Cross, the Author is still prohibited from using the American Red Cross name and emblem to promote and/or market the book or other literary work.

Finally, Authors are reminded that they may not use property of the American Red Cross in the creation of their books and other literary works, including (but not limited to) letters from members of the public sent to the American Red Cross and pictures and drawings belonging to the American Red Cross.

Authors are encouraged to obtain legal and/or business representation to ensure that they are complying with all applicable federal, state and local laws and regulations.

If you have any questions about this policy, please contact the Office of the General Counsel at (202) 303-5433.