



# Code of Ethical Conduct

KAISER PERMANENTE'S PRINCIPLES OF RESPONSIBILITY



# Table of Contents

|   |    |
|---|----|
| Our Values Statement .....  | 2  |
| The Responsibility Belongs to All of Us .....                         | 3  |
| Our Responsibility to Our Colleagues .....                            | 7  |
| Our Responsibility to Our Members, Patients, and Communities .....    | 10 |
| Our Responsibility to Avoid Conflicts of Interest .....               | 14 |
| Our Responsibility to Safeguard Our Assets .....                      | 18 |
| Our Responsibility to Meet Legal and Regulatory Expectations .....    | 21 |
| Our Responsibility to Protect Our Reputation .....                    | 24 |
| Our Responsibility to Speak Up if We Have Questions or Concerns ..... | 25 |



As valued Kaiser Permanente employees, physicians, dentists, board members, contractors, and agents, your commitment to ethics and compliance is central to delivering on our mission. This collective, unwavering dedication to doing the right thing protects our organization's reputation, enabling us to provide high-quality, affordable health care services and to improve the health of our members and communities.

Our Code of Ethical Conduct outlines the core responsibilities each of us has in creating and maintaining an ethical culture. It centers on our mission and serves as a framework to help us create and preserve trust by making ethical decisions. We must act, think, and talk about ethics and compliance on an ongoing basis, as building a culture of integrity and ethics requires consistent investment.

One of the most important responsibilities each of us carries is to ask questions, and to speak up if we see or hear something that doesn't feel right. Your voice matters, and your commitment to this critical effort protects the trust that our customers, employees, partner organizations, government, and communities place in Kaiser Permanente.

## The Responsibility Belongs to All of Us

Kaiser Permanente is committed to providing high-quality, affordable health care services and to improving the health of our members, our patients, and the communities we serve. This Code of Ethical Conduct supports this commitment, serving as a framework to help us exercise good judgment and make ethical decisions.

It's up to each of us to think, speak, and act in ways that build and protect the trust our members, patients, customers, colleagues, partner organizations, government, and communities place in Kaiser Permanente.

More than ever, people care not only about what organizations do, but also why and how they do it. Organizations that lead with ethics do well by acting with integrity and equity. Your commitment to upholding our shared ethical and equitable standards is essential for Kaiser Permanente to thrive.



## Every Physician, Dentist, and Employee Must Follow the Code of Ethical Conduct

We're all responsible for helping to maintain an ethical, equitable, and compliant organizational culture. We do this through our daily habits, decisions, and actions. Anyone who works for or on behalf of Kaiser Permanente is required to follow all applicable laws, policies, and this Code of Ethical Conduct. Additionally, each manager and leader is expected to lead by example. Managers and leaders serve as positive role models and inspire others to embrace our Code of Ethical Conduct by rewarding integrity, encouraging ethical decision-making, creating a transparent and open work environment, promoting a speak-up environment, preventing retaliation against those who speak up, and seeking help in resolving and escalating issues.

The ethical expectations outlined in this Code of Ethical Conduct apply not only to our physicians, dentists, advanced practice practitioners, and employees, but also to people who provide services to Kaiser Permanente but are not on our payroll. Additionally, our boards of directors receive copies of the Code of Ethical Conduct and are directed to comply with it in their performance of services on behalf of Kaiser Permanente.

### How to Learn More

While this Code of Ethical Conduct is an important tool for navigating ethical dilemmas, it does not explicitly cover every conceivable situation or circumstance an employee might face. There are other resources available to support you in doing the right thing. Access Kaiser Permanente's compliance websites through [kp.org/compliance](https://kp.org/compliance) or through your national, regional, or physician web portals.

Many of the topics described in this Code of Ethical Conduct are addressed in detailed policies and procedures. Kaiser Permanente has adopted these policies and procedures that apply to your job and how you conduct yourself at work. Be sure to read, understand, and comply with the policies that apply to you.



Visit the Kaiser Permanente Policy Library at <https://kpnational.policytech.com/> to find policies that cover employees of Kaiser Foundation Health Plans and Hospitals (“KFHP/H”), and, in some instances, the non-physician staff of the California Permanente Medical Groups as well. Links to some of these policies are listed throughout this Code of Conduct. Policies available in Kaiser Permanente’s national policy library that apply to all physicians and employees are also listed throughout, identified by the “ENTERPRISEWIDE” notation.

The Permanente Medical Groups and Permanente Dental Associates have their own policies for physicians and their employees; your leader or Human Resources Department can help you access those policies.

The “Scope” Section of a policy will indicate which Kaiser Permanente entities the policy covers.

### **Ways to Speak Up**

Your voice matters! One of the most important responsibilities we share is to speak up with any ethical concerns or questions, as well as with ideas that can help the organization improve. Supporting a speak-up culture is part of Kaiser Permanente’s ongoing commitment toward creating an innovative, equitable, and inclusive workplace that reflects belonging, psychological safety, empathy, and allyship.

You can always go to your supervisor, leader, human resources representative, union representative, or the Ethics and Compliance department to discuss an ethical concern or question. Kaiser Permanente strictly prohibits any form of retaliation against those who speak up in good faith.



In keeping with this commitment, Kaiser Permanente does not tolerate any kind of harassment or abusive conduct related to the Kaiser Permanente workplace, towards anyone or by anyone, including any manager, supervisor, physician, advanced practice practitioner, coworker, or non-employee. If you prefer to remain anonymous, you can make a report via the Kaiser Permanente Compliance Hotline (1-888-774-9100) or Webline ([kp.org/compliancehotline](https://kp.org/compliancehotline)). Both are available 24/7.

No matter how you choose to speak up, we take your concerns seriously and address them promptly. For more information on what happens when you report a concern, [visit the One Compliance website](#).

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following term in the policy library:

- Non-Retaliation



## Our Responsibility to Our Colleagues

We believe that every physician, advanced practice practitioner, dentist, and employee at Kaiser Permanente has the right to receive fair and just treatment, and that we all share the responsibility to treat one another respectfully.

### Our Commitment to Equity, Inclusion, and Diversity

Throughout Kaiser Permanente's history, we have consistently taken a stand for equity, inclusion, and diversity, which are core to our mission and part of everything we do.

We know that having a diverse and inclusive workforce makes Kaiser Permanente a better place to receive health care, a better partner in our communities, and a better place to work. We're proud that our organization continues to reflect the diversity of the communities we serve and embraces the value that diversity of race, ethnicity, age, gender, religion, ability, sexual orientation, military experience, and other dimensions bring to our shared mission.

Our equity principles and commitments are centered on fair and just treatment, access, opportunity, and advancement for our workforce. [Our equity principles](#) guide our practices and behaviors to uphold the racial, health, and workforce equity standards that reflect Kaiser Permanente's mission and vision. Through our equity commitments, we evaluate and improve our organization's foundational systems to consistently strengthen workforce equity.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Commitment to Equity, Inclusion, and Diversity
- Equal Employment Opportunity and Affirmative Action
- Job Accommodation
- Religious Accommodation

Kaiser Permanente prohibits discrimination against our workforce based on age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, and veteran status, or any other basis protected by federal, state, or local law.



## Fostering a Harassment-Free Environment

We believe in personal dignity and respect for one another. We do not tolerate harassment of any kind and have robust policies and reporting processes in place to prevent harassment.

If you are the victim of workplace harassment or discriminatory conduct, or if you see or hear it taking place, report it immediately. You may use the [Kaiser Permanente Compliance Hotline](#) or, for KFHP/H employees, [the Equal Employment Opportunity Internal Complaint Procedure](#). Permanente Medical Group physicians and employees may use other reporting channels and should consult their Human Resources or Compliance officers for details.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Equal Employment Opportunity and Affirmative Action
- Commitment to a Harassment-Free Work Environment

## Addressing Workplace Safety and Security

We all play a role in promoting workplace safety. Kaiser Permanente's senior leaders are responsible for having the right policies, procedures, systems, tools, equipment, and training in place, and for addressing unsafe conditions or security issues promptly. It is all of our responsibility to participate in safety training, to follow safety standards, and to promptly report any unsafe conditions or security-related issues.



To protect the safety and security of everyone at our facilities we prohibit acts of threats or violence. If you see someone demonstrating threatening behavior you should contact Security.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following term in the policy library:

- Environmental, Health and Safety

All physicians and employees should consult the Enterprisewide policy listed below for more information:

- [Threats and Violence in the Workplace: Prevention and Management, NATL.ESS.002 \[ENTERPRISEWIDE\]](#)

## Supporting Each Other

Kaiser Permanente is committed to protecting and supporting your safety, physical and mental health, and well-being. Kaiser Permanente encourages any individual needing support with their physical or mental health, or suffering from alcohol or substance abuse problems, to seek professional assistance. For resources to support you and your family, visit the [Employee Assistance Program \(EAP\) website](#).



## Our Responsibility to Our Members, Patients, and Communities

When caring for our members and patients and serving our communities, we strive to act with courtesy, in a careful, equitable, considerate manner, and with professionalism.

### Protecting Our Members' and Patients' Privacy and Security

People trust us with their most private information, and we have an ethical and legal duty to keep it secure. You are required to complete annual training that covers appropriate access to and use of Kaiser Permanente applications and systems.

You should only access and discuss the minimum amount of protected health information (PHI) necessary to do your job. Keep electronic devices secure and passwords protected, and store confidential information, such as PHI, only on Kaiser Permanente's secured network servers.

All physicians and employees should consult the Enterprisewide policies listed below for more information:

- [Uses and Disclosures of PHI and Minimum Necessary, NATL.EC.PRIV.014 \[ENTERPRISEWIDE\]](#)
- [User Access Management, NATL.IS.012 \[ENTERPRISEWIDE\]](#)



## Understanding and Appreciating Diversity of Our Members, Patients, and Communities

We have the privilege of serving a diverse population. This privilege comes with the responsibility to consider and respect members', patients', and communities' cultural needs and values. We strive to deliver unbiased, equitable, and culturally and linguistically appropriate health care and services.



Kaiser Permanente prohibits discrimination against all individuals, including patients, members, and visitors, based on age, color, disability, ethnicity, family or marital status, gender identity and expression, language, national origin, political affiliation, race, religion, sex (including pregnancy), sexual orientation, socio-economic status, military or veteran status, and medical condition, or any basis protected by federal, state, or local law. Kaiser Permanente does not exclude people or treat them differently because of their membership in any protected class, and provides reasonable accommodations needed to deliver equitable access to care for people of all abilities.

All physicians and employees should consult the Enterprisewide policies listed below for more information:

- [Nondiscrimination in the Provision of Healthcare, NATL.HPHO.007 \[ENTERPRISEWIDE\]](#)
- [Equal Access to Facilities, Services, and Programs, NATL.HPHO.008 \[ENTERPRISEWIDE\]](#)

## Advancing Health and Health Equity in the Communities We Serve

We believe that everyone has the right to thrive, and we are deeply committed to health equity. Recognizing that systemic racism and other forms of social injustice have led to poorer health care access and outcomes for our most vulnerable populations, we are working to eliminate disparities in health care access, experiences, and outcomes and help ensure more healthy years for everyone.

### Promoting Health Access

We are committed to serving those most in need of health care through Medicaid, medical and dental financial assistance, charitable health coverage, and other forms of subsidized care and coverage. We also connect people with wrap-around social services, healthy meals, affordable homes, safe playgrounds, supportive schools, and additional community resources.



Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Medical Financial Assistance

## Improving Community Conditions

We are working to improve the conditions for health and equity in our communities by addressing the root causes of health, such as economic opportunity, affordable housing, safe and supportive schools, and a healthy environment.

Kaiser Permanente encourages physicians, dentists, and employees to participate in their communities and provides opportunities to volunteer in sponsored projects and contribute to not-for-profit organizations.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Community Service

## Minimizing Our Environmental Footprint

We are dedicated to environmental sustainability because a healthy environment has a direct and positive impact on both individual and community health. We all should limit Kaiser Permanente's environmental impact by reducing waste, participating in recycling programs, conserving energy and water, and using renewable resources whenever possible.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Sustainable Resources

## Excelling and Innovating in Our Professions

We always strive to learn. We are dedicated to raising our own standards and the standards of our professions through continuous learning, performance improvement, research, training, adoption of new technology, and investment in state-of-the-art facilities. We deliver care and services through teamwork, because it is through collaboration with others that we can be most effective.

## Our Responsibility to Avoid Conflicts of Interest

Every day, we take actions and use words that have the potential to enhance the trust placed in Kaiser Permanente. Workplace decisions must be made objectively, equitably, and fairly, free from any actual or perceived conflicts of interest.

Conflicts of interest occur any time roles, responsibilities, relationships, financial interests, or other activities influence, or might reasonably appear to influence, your ability to make an objective and fair decision based solely on what is best for Kaiser Permanente and the members, patients, customers, and communities we serve. This may include secondary employment, volunteering on an external board, and other paid or unpaid activities outside of your employment with Kaiser Permanente.



If you think that you might have a conflict of interest, talk with your leader, immediate supervisor, human resources representative, union representative, or compliance officer. These situations may not be clear-cut and will be reviewed by experts on a case-by-case basis.

Depending on your role, you may be asked to complete a conflicts of interest disclosure form. Even if you don't receive a disclosure form, you must report any actual or potential conflicts of interest. Our compliance professionals are here to help you appropriately manage any such conflicts that may arise.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Conflicts of Interest

### **Partnering Ethically with Vendors**

Kaiser Permanente selects suppliers and vendors fairly, objectively, in the interest of our members, patients, customers, and communities, and in the best interest of our organization. Once we have engaged with a vendor, our relationship must be conducted in a way that avoids conflicts of interest and the appearance of conflicts of interest. Additionally, do not seek to operate in a way that would violate antitrust or unfair competition laws. These laws prohibit working together with competitors to stifle competition by setting prices, terms, or conditions of sale; boycotting customers or suppliers; dividing markets by customers, territories, or services; or other activities that limit free-market competition.

When it comes to third-party business relationships, giving or accepting gifts or accepting honoraria or speaking fees could undermine the trust placed in Kaiser Permanente and even carry legal implications. Before agreeing to paid speaking engagements, check with your leader, your immediate supervisor, or National Communications.





Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Conflicts of Interest: Vendor Relationships

### **Hiring Relatives and Personal Relationships**

Employment decisions must always be based on merit, qualifications, and competence. Kaiser Permanente permits relatives and individuals in a personal relationship to work together if they are the most qualified candidates. However, to avoid conflicts of interest, Kaiser Permanente prohibits employees from directly supervising relatives or any others with whom they have a personal relationship.

You must give written notice to your leader or your immediate supervisor (in your current department or any that you transfer to) of any work situations involving the employment of relatives, members of your household, or someone with whom you have a personal relationship.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Employment of Relatives and Employees with Personal Relationships



## Accepting Expressions of Gratitude

During times when our care professionals are on the front lines of responding to crises, generous individuals and organizations often wish to contribute to our efforts and show their thanks. Kaiser Foundation Health Plan, Inc. (KFHP) and Kaiser Foundation Hospitals (KFH), as well as many of their subsidiaries, are tax-exempt organizations, and must follow important guidelines around how we manage these gestures.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Contributions to Health Plans and Hospitals

Sometimes, members and patients want to express their appreciation for the care they received by giving a Kaiser Permanente physician, advanced practice practitioner, dentist, or employee a gift. You can accept modest gifts from grateful patients. Accepting goods or services at or below market value from patients or their relatives, in relation to your job, is equivalent to a gift. If you receive a more than modest gift from a patient, speak with your leader, your immediate supervisor, human resources representative, union representative, or compliance officer.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Conflicts of Interest



## Interacting Appropriately with Government Officials

Most government officials and their staffs are prohibited from accepting anything of value. Speak with your compliance officer, the Kaiser Permanente attorney for your area, and/or the government relations department if you are thinking of offering gifts to any government officials or their staffs, inviting them to any Kaiser Permanente event, or providing them with food and beverage during an unannounced visit.

## Our Responsibility to Safeguard Our Assets

Kaiser Permanente's assets allow us to deliver on our mission of providing high-quality, affordable health care services for our members, patients, and communities. We all must handle these assets with care and protect them against all forms of misuse, waste, damage, and loss. Do not use Kaiser Permanente assets for personal gain or dispose of assets outside of authorized practices, regardless of their condition or value. Leaders and immediate supervisors have a responsibility to keep track of the assets issued to their team.

## Protecting Confidential Information

Confidential information, such as Kaiser Permanente's financial data and reports, non-public business and clinical strategies and initiatives, pricing information, and other competitive information, should not be shared with anyone outside the organization, unless you have received approval to disclose it from the appropriate decision-maker.

Protecting our confidential information also involves the responsible use of new technologies, such as generative artificial intelligence (AI) tools. Employees should not use the public consumer version of AI tools for Kaiser Permanente work-related purposes and should not enter confidential information, PHI, or personally identifiable information (PII) into an AI tool without prior approval from your manager. All intellectual property generated in the course and scope of your employment with our organization is the property of Kaiser Permanente.

For interest in possible use cases for Private AI Chatbots, please submit your use cases to the AI Center of Enablement at [AICoE@kp.org](mailto:AICoE@kp.org) for an evaluation and risk assessment.

All physicians and employees should consult the Enterprisewide policy listed below for more information:

- [Data Protection, NATL.IS.021 \[ENTERPRISEWIDE\]](#)

This requirement is not intended to limit communications regarding matters unrelated to Kaiser Permanente or lawful off-duty conduct, or to prohibit communications concerning wages, benefits, or other terms and conditions of employment otherwise legally protected under the National Labor Relations Act or any other applicable law.

### **Using Information Systems Appropriately**

All communication on Kaiser Permanente-owned devices must be conducted in a professional, respectful, and lawful manner. Use of personal electronic devices or Kaiser Permanente devices for non-business reasons should never interfere with your job duties or detract from providing high-quality patient care and services.

When you use Kaiser Permanente information systems, all data and communications — including email, chat, text messages, and voicemail messages — is the property of Kaiser Permanente and can be monitored and reviewed.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Electronic Asset Usage

### **Eliminating Fraud, Waste, and Abuse**

Kaiser Permanente's fraud control program protects our members and patients, preserves our resources to reduce costs, and helps us provide affordable health care services. This is part of our mission and values and requires all of our participation.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Fraud, Waste, and Abuse Control

Kaiser Permanente funds, which include anything with financial value, must be handled responsibly, honestly, and in strict compliance with Kaiser Permanente policies. Corporate credit cards must be used only for authorized business purposes.

### **Maintaining Accurate Business Records**

Maintaining accurate business records safeguards our assets and protects the trust placed in Kaiser Permanente by our members, customers, patients, and the communities we serve. For employees that are authorized to sign documents on behalf of Kaiser Permanente, only sign when you know that all information is accurate. Information should never be falsified. Required information should never be intentionally left out, hidden, or covered up.

Kaiser Permanente business records, both paper and electronic, should be retained or destroyed according to federal, state, and local laws and regulations; applicable licensing, accreditation, and contractual requirements; and applicable Kaiser Permanente policy.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Business Record Retention

All physicians and employees should consult the Enterprisewide policies listed below for more information:

- [Amendments to the Patient Health Record, NATL.REVCYC.013 \[ENTERPRISEWIDE\]](#)
- [Compliance with Deficit Reduction Act Requirements, NATL.EC.019 \[ENTERPRISEWIDE\]](#)



## Our Responsibility to Meet Legal and Regulatory Expectations

The Code of Ethical Conduct does not address every situation that could arise in our work. Our commitment to protecting the trust placed in Kaiser Permanente means that we must fully adhere to federal, state, and local laws and regulations; federal health care program requirements; licensing requirements; accreditation standards; and requirements of the Centers for Medicare & Medicaid Services and federal, state, and customer contracts. Additionally, you have an ethical duty to report or cooperate with any investigations of violations of laws, regulations, and policies.



### Responding to Requests for Information

We should be accurate, timely, complete, and truthful in responding to requests from government agencies. Physicians, dentists, advanced practice practitioners, and employees must cooperate with government officials. If you receive a government agency inquiry in the course of your work duties, or a subpoena or other legal document that is not addressed to you personally, contact your leader, immediate supervisor, or compliance officer right away. Management-level employees should coordinate responses appropriately with leadership, compliance, or legal. If, in the course of responding to a government agency, you discover or suspect that you or someone else has made a misrepresentation — either by saying something untruthful or by creating a misunderstanding or misimpression through an omission — you must correct it immediately.

## Following Licensing and Certification Requirements

Regulations that apply to Kaiser Permanente include, but are not limited to, everything from federal and state licensure for professional practices, to Medicare program participation requirements, and building codes. You are responsible for knowing and maintaining all professional licensing and certification requirements that apply to you.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- License, Certificate, and Registration Verification



## Interacting with Individuals and Organizations Restricted by the Government

The government keeps lists of individuals and organizations that have been excluded from government contracting; are not allowed to contract or subcontract with Medicare, Medicaid, or other government health programs; or have opted out of Medicare programs.

We screen these lists prior to a job candidate becoming an employee of Kaiser Permanente and monthly after an individual is hired. If you are added to any of these government exclusion lists, you must provide written disclosure to your leader or immediate supervisor as soon as you become aware of it. Any existing or proposed employment, contract, or other association with any individual or entity on these lists will be handled on a case-by-case basis in accordance with the law and Kaiser Permanente policies.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Identifying and Responding to Ineligible Individuals and Entities

## Engaging in Political Activities and Making Political Donations

Kaiser Permanente respects your right to participate in partisan political activities on your own time, using your own resources, as a private individual.

Kaiser Foundation Health Plan, Inc. (KFHP) and Kaiser Foundation Hospitals (KFH), as well as many of their subsidiaries, are tax-exempt organizations. The privilege of having a tax-exempt status comes with very strict rules under the Internal Revenue Code and Internal Revenue Service regulations.



Federal law prohibits KFHP/H from engaging in any partisan political activities, defined as participating in or supporting campaigns of candidates for public office, including making campaign contributions. Doing so would jeopardize our tax-exempt status.

All physicians and employees should also consult the Enterprisewide policy listed below.

- [Prohibited Partisan Political Activities, NATL.HR.008 \[ENTERPRISEWIDE\]](#)

The rules are different for the Permanente Medical Groups and Permanente Dental Associates, which are taxable organizations. Each of the Permanente Medical Groups and Permanente Dental Associates have adopted their own policies related to political activities.



## Our Responsibility to Protect Our Reputation

Federal and state laws protect the public from marketing that is deceptive and dishonest. Determining how, where, and to whom we advertise Kaiser Permanente products and services involves strategy, creativity, and consistency. It also involves being truthful and accurate.

Authorization by public affairs or communications staff is required to communicate externally as a spokesperson or representative of Kaiser Permanente. This includes communication in any printed, spoken, or electronic form, for example: speeches, interviews, advertisements, or social media posts. External communication on behalf of Kaiser Permanente must be reviewed and approved in advance by public affairs or communications staff.

You are responsible for what you publish online. When you communicate in your personal capacity about matters related to Kaiser Permanente, be careful to identify your opinions as your own and not those of Kaiser Permanente. Always maintain the confidentiality of our members and patients.



Your affiliation with Kaiser Permanente on one social media site can be linked to statements made on another site. Take care to understand the impact that even non-work-related communications can have on your reputation, as well as that of Kaiser Permanente. We respect your legal right to express either protected political opinions or to engage in protected concerted activity under the National Labor Relations Act.

Physicians and employees of the Permanente Medical Groups should consult their leader, Human Resources department, or organization-specific policy resource for direction on relevant policies. KFHP/H employees can get more information by searching for the following terms in the policy library:

- Social Media



## **Our Responsibility to Speak Up if We Have Questions or Concerns**

It's important that we speak up if we see or hear something that doesn't feel right or equitable, and it's important to speak up if we have ideas to improve the organization. When you speak up, your manager has the duty to listen and follow up promptly. While you are encouraged to raise concerns directly with your leader, supervisor, human resources representative, union representative, or compliance officer, the Kaiser Permanente Compliance Hotline provides a channel for employees to confidentially and anonymously report suspected compliance issues. Both the KP Compliance Hotline at 1-888-774-9100 and the Kaiser Permanente Compliance Webline ([kp.org/compliancehotline](https://kp.org/compliancehotline)) are available to you 24/7, 365 days of the year.