

## **CODE OF ETHICS AND BUSINESS CONDUCT**

### ***“Integrity in Clinical Sleep Disorders Dentistry Education and Certification”***

Our *Code of Ethics and Business Conduct* is intended to serve as a guide to sound ethical principles and proper conduct for both the Academy Team (that is, the Executive Director, Founding Directors and Staff, Medical Director, Dental Director, Dental Advisor, Advisory Council, Committee Chairs, and Committee Members) and the member-customers of the Academy. In that the Code is binding for employees and member-customers alike, it is the intention of the ACSDD (The Academy) that our integrity stretch from Academy leadership to the Dentists, Physicians, and all other relevant healthcare practitioners who call our Academy home and to the Advisors, Committee Members, Faculty, and Lecturers of the Academy.

#### **Ownership Statement**

The Academy is solely owned by its Executive Director. There are no other owners. The Academy does not endorse or recommend any products, devices, appliances, services, organizations, or individuals to its members. We educate our members in sleep disorders dentistry; it is their decision to determine which products, devices, appliances, services, organizations, or individuals will best help them deliver that knowledge to improve patient care and treatment.

#### **Set the Example**

The Academy Team has the vital responsibility of setting the example.

We are responsible for addressing ethical questions or concerns raised by member-customers and taking the appropriate steps to deal with such issues. In addition, our member-customers must abide by the ethical code with the integrity that is foundational to the Academy. As stated in our mission and vision statements, the Academy prides itself on its refusal to permit in-fighting, hidden agendas, and political positioning within its walls.

#### **Build Trust and Credibility**

The success of the Academy rests firmly on trust and credibility.

When considering any organizational or member-customer action within the Academy, the central questions are: Is this action in keeping with the Academy’s mission and vision? Will this action build trust within the Academy? Will the action ensure the Academy’s long-term success? Will we be able to follow through on the action taken with honor and integrity? In order for the Academy to build trust, we must answer yes to each of these questions prior to taking action.

This trust and credibility are earned by the Academy Team via our treatment of our member-customers and are earned by our member-customers via their treatment of the Academy. Following through on our commitments to our member-customers, displaying honesty and integrity in those actions, and reaching the Academy’s goals through honorable conduct are our Academy’s reciprocated hallmarks.

#### **Respect the Individual**

The Academy fosters an environment where the member-customer is treated with dignity and respect.

The Academy believes that such an environment brings out the full potential of all those involved which, in turn, contributes to the caliber of our clinical education and other programs, the satisfaction of our member-customers, and the success of the Academy.

The Academy is committed to providing an educational forum that is free from discrimination of all types, abusive and/or offensive behavior, as well as harassment. Further, as stated in our mission and vision, the Academy prides itself on its refusal to tolerate in-fighting, hidden agendas, and political positioning within its walls. In accordance with said mission and vision statements, the Academy reserves the right to discipline any Academy individual and deny or revoke member-customer privileges when it becomes apparent that respect for the individual and/or the Academy environment has been compromised.

### **Create a Culture of Open and Honest Communication**

The Academy Team supports open and honest communication where member-customers feel comfortable raising questions, particularly in regard to ethics concerns.

The Academy Team and our member-customers benefit when all those involved exercise their power responsibly by asking the right questions. The Academy will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the Academy will take appropriate action. Additionally, The Academy will not tolerate retaliation against any Academy individual who raise ethical concerns in good faith.

### **Uphold the Law**

The Academy's commitment to integrity includes compliance: both legal and ethical.

The Academy Team as well as our member-customers must have an understanding of the Academy's policies, laws, rules, and regulations that apply to our specific organization. If we are unsure as to whether a contemplated action is permitted by law or Academy policy, we must seek advice from an expert. Both the Academy Team and member-customers are responsible for preventing violations of the law and speaking up if we identify what we think may be possible violations.

### ***Competition***

We are dedicated to ethical, fair, and vigorous competition. The Academy's educational programs and other services rest solely on their merit, superior quality, and basis in cutting-edge, evidence-based dental and medical science. We will not engage in inappropriate politicking with other similar academies, nor will we tolerate such behavior from those other academies. We will not offer or solicit improper payments or gratuities in connection with the purchase of Academy education or services nor will the Academy engage in or assist with unlawful boycotts of other academies (or vice versa).

### ***Proprietary Information***

The Academy respects the property rights of other academies and expects the same respect from other academies. We will not acquire or seek to acquire by improper means a competing academy's trade secrets or other proprietary or confidential information, and we expect the same of other academies. We will not engage in unauthorized use, copying, distribution, or alteration of educational material or other intellectual property, and we expect the same of other academies.

### ***Selective Disclosure***

The Academy discusses its nonpublic information only with its Advisory Council, and any such discussions are solely at the discretion of the Executive Director. The Academy will not selectively disclose any nonpublic information to any member-customer, competing academy, vendor, et cetera.

### ***Conflicts of Interest***

The Academy avoids any relationships or activities that might impair or even appear to impair our ability to make objective and fair decisions. It is our responsibility to our member-customers to advance their legitimate interests when the opportunity to do so arises. The Academy Team as well as member-customers must never use Academy property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with the Academy, unless expressly permitted by the Executive Director in writing.

Because the Academy is an educational organization, and prides itself on utilization of credible individuals and objective presentation of research on the cutting edge of evidence-based sleep disorders dentistry, our mission and vision require that we remain vigilant in three areas: our Advisory Council, our Curriculum, and our Selection of Faculty/Lecturers.

(Please see the *Conflict of Interest Statement for Directors, Advisory Council Members, Committee Members, Staff Members, and Faculty/Lecturers for The Academy of Clinical Sleep Disorders Disciplines* at the end of this document.)

### ***Accountability***

The Academy Team and the Academy's member-customers are responsible for adhering to the values and standards set forth in this document. All parties involved in the Academy are also responsible for raising concerns if there is uncertainty regarding Academy policy or adherence to this document. Central to the Academy's success is the protection of confidential Academy information and nonpublic information entrusted to the Academy Team. The Academy Team will not disclose confidential and/or nonpublic information without a valid legal purpose and proper authorization.

## **ANNUAL REVIEW OF THE CODE OF ETHICS AND BUSINESS CONDUCT**

Compliance with the principles presented in this document is essential to the Academy's success. Our *Director of Research & Compliance* is responsible for ensuring the items set forth in this document are communicated clearly and understood by the Academy Team and the member-customers of the Academy.

Review of the code is January of each year. Both the Academy Team and its member-customers monitor and are monitored for compliance with the Code. Complaints may be registered with the Director of Research and Compliance in confidence. Should an Academy Team member or member-customer be found in violation of the Code, appropriate action will be taken.

**CONFLICT OF INTEREST STATEMENT**  
**for**  
**Directors, Advisory Council Members, Committee Chairs, Committee Members, Staff Members,**  
**and Faculty/Lecturers**  
**for The Academy of Clinical Sleep Disorders Disciplines (ACSDD)**

No ACSDD director, advisory council member, committee chair, committee member, staff member, educational participant, or vendor shall derive any personal profit or gain, directly or indirectly, by reason of his or her participation with the ACSDD. Each individual shall disclose to the ACSDD any personal interest which he or she may have in any matter pending before the ACSDD and shall refrain from participation in any decision on such matter.

Each director, committee member, staff member, or educational participant of a client organization and each vendor for the ACSDD shall identify his or her affiliation with that client organization. Additionally, in connection with any committee action specifically directed to that client organization, s/he shall not participate in the decision affecting that agency and the decision must be made and/or ratified by the ACSDD Advisory Council.

All directors, advisory council members, committee members, staff members, and educational participants shall refrain from obtaining any list of clients for personal or private solicitation purposes at any time during the term of their affiliation.

At this time, I am a board member, committee member, or an employee of the following organizations:

---

---

---

Now this is to certify that I, except as described below, am not now nor at any time during the past year have been:

- 1) A participant, directly or indirectly, in any arrangement, agreement, investment, or other activity with any vendor, supplier, or other party doing business with the ACSDD which has resulted or could result in personal benefit to me.
- 2) A recipient, directly or indirectly, of any salary payments or loans or gifts of any kind or any free service or discounts or other fees from or on behalf of any person or organization engaged in any transaction with the ACSDD.
- 3) Any exceptions to 1 or 2 above are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have (or have had during the past year) in the persons or organizations having transactions with the ACSDD. (Continue on back, if necessary.)

---

---

Print Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_