



THE LOOKOUT



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ETHICS & COMPLIANCE OFFICE

As with many sectors that we operate in, Healthcare is a highly regulated industry that has inherently high risks. Therefore, it is essential to have an effective Ethics & Compliance programme in place to support our healthcare assets and employees. By embedding full time Ethics & Compliance Business Partners in Cleveland Clinic Abu Dhabi and Healthpoint, we foster and support a culture of Ethics & Compliance within the Healthcare Assets.

Together, Lara Mcguigan and Hind Al Shehhi lead the Mubadala Healthcare Ethics & Compliance Programme; they are there to support employees with inquiries, clarifications, or concerns. By focusing on unique risks and issues within the Healthcare Sector, Lara and Hind blend world-class Ethics & Compliance Practices with knowledge of the industry, leading to them being able to provide the highest level of support to the Healthcare Assets.

We highly encourage you to participate in Ethics & Compliance initiatives, trainings, and that you educate yourself on specific risks that arise in your industry. If you have any questions, please do speak to us or reach out to your Ethics & Compliance Network Representative.



Investigations Workshop by the Ethics & Compliance Office

On 14 March, the Ethics & Compliance Office delivered a one-day Investigations Workshop attended by over 70 Mubadala Group employees from various Sectors, Divisions and Assets.

The Workshop aimed to provide attendees with a practical understanding of the key elements and steps of an investigation, and equip them with the skills required to support the Ethics & Compliance Office on internal investigations. Another key objective of the Workshop was to demonstrate that what makes for a successful investigation is not any one particular element, but the combination of good preparation, strategy, and right questioning.

The Workshop divided the typical stages of an investigation into three main sections:

- Handling the Intake
- Conducting the Investigation
- Closing the Investigation

The Workshop included live role-played scenarios at the end of each section that



Compliance Highlights

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- UAE employee earning Dh160,000 a month charged with taking Dh300,000 bribe
- UK Bribery Act first contested failure-to-prevent case
- Greek MPs launch probe into Novartis scandal



revolved around a mock investigation into allegations of misconduct at a hypothetical Mubadala asset.



"Each official shall be held accountable for his work. There is no difference between a high-level and a low-level official because an official's value is measured by the obligations he meets and his commitment to fulfilling his responsibilities."

The Late Sheikh Zayed bin Sultan Al Nahyan



A South Texas doctor was alleged to be involved in a \$240 million healthcare fraud and international money laundering scam that made him rich enough to buy a private jet, a Maserati, a Porsche and high-end real estate in the United States and Mexico.

Dr. Jorge Zamora-Quezada, 61, pleaded not guilty to one count of conspiracy to commit healthcare fraud, five counts of healthcare fraud and one count of conspiracy to commit money laundering. He is accused of misdiagnosing patients, possibly putting their lives in danger, so he could bill the government for unneeded expensive treatments that fed his lavish lifestyle.

"The allegations that Zamora-Quezada violated his oath to do no harm by administering unnecessary chemotherapy and other toxic medications to patients with serious diseases - including some of the most vulnerable victims imaginable - are almost beyond comprehension," said Acting Assistant Attorney General John P. Cronan of the Justice Department's Criminal Division.

[Read full article here](#)

Training & Events

- **3 May 2018:**
ARCC Essentials Training at LAB
- **9 May 2018:**
Alternative Investments & Infrastructure and Corporate Ethics & Compliance Network Meeting
- **15 May 2018:**
Mubadala Petroleum Travel & Expenses Training
- **13-14 May 2018:**
Training for Injazat on Compliance Policies and Best Practices
- **14 May 2018:**
Training on Code of Conduct onboarding for Capitala
- **21 May 2018:**
Training for BMS on Building an Ethical Culture
- **28 May 2018:**
Conflict of Interest Training Sessions at Aabar

Upcoming Training & Events

- **1 October 2018:**
Launch of '2018 E&C e-learning and Code of Conduct certification



Tips

Exhibit ethical behavior and speak openly and frequently about the role of Integrity in the workplace.

Treat everyone with respect and dignity – never threaten, humiliate, or use suggestive or disparaging language or

actions.

Walk around the office with your eyes and ears open – remember: if you see it, say it.

The Health Insurance Portability And Accountability Act

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"It's just the new Compliance Officer. Administration wanted him to have more visibility with the staff."

