



CONFLICT OF INTEREST POLICY

Every Trustee, Officer, Employee, Resident, Fellow and Medical Staff of the Hospital should be aware of the need to avoid personal situations which may be construed as conflicts of interest; that is, any personal interest or relationship outside or in the Hospital which could make it personally advantageous to place self-interest above his or her ethical obligations to the Hospital. A conflict of interest may exist in fact or in potentiality, if the opportunity and temptation is present.

For the guidance of Trustees, Officers, Employees, Residents, Fellow, and the Medical Staff, the following rule is adopted:

No Trustee, Officer, Medical Staff, Resident, Fellow, or Employee or a member of his or her immediate family or an entity controlled directly or indirectly by any of them of the Hospital shall have any beneficial interest in, or a substantial interest whether investment, compensation or otherwise or substantial obligation in any other business enterprise or organization that is engaged in doing business with the Hospital, the existence of which would conflict or may reasonably be supposed to conflict with the proper performance of his/her duties or responsibilities, or which may tend to affect his or her independence of judgment with respect to transactions between the Hospital and such other business enterprise, unless it has been approved by or determined by the Board of Trustees, on the basis of full disclosure of facts, that such interest does not give rise to a conflict of interest.

For purposes of this conflict of interest policy, immediate family is defined as your spouse, son, sibling, parents, stepchildren, stepparents, as well as mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandson, granddaughter and to any other individual who live in your household.

Without limiting the generality of the foregoing, the following are examples of actions or activities which may cause conflicts of interest or which may involve the potential for conflict situations:

- A. Use of confidential or otherwise privileged information for personal benefit during the tenure of the Trustee, Officer, Medical Staff, Resident, Fellow, or Employee or a member of his or her immediate family or an entity controlled directly or indirectly by any of them of the Hospital and for six (6) years thereafter. The prohibited use of confidential or otherwise privileged information for personal benefit specifically includes, but is not limited to, the disclosure and/or transmission to a third person or entity of such confidential or otherwise privileged information, as well any other use thereof for the personal gain of the Trustee, Officer, Medical Staff, Resident, Fellow, or Employee or a member of his or her immediate family or an entity controlled directly or indirectly by any of them or the former Trustee, Officer or Medical Staff, Resident, Fellow, or Employee or a member of his or her immediate family or an entity controlled directly or indirectly by any of them as the case may be. During the tenure of a Trustee, Officer, Medical Staff, Resident, Fellow, or Employee or a member of his or her immediate family or an entity controlled directly or indirectly by any of them of the Hospital and for six (6) years thereafter, the use of confidential or otherwise privileged information as well as the use of other Hospital information which was not made generally available as a basis for expert testimony in a judicial or administrative proceeding is to be specifically construed to be prohibited under this section.
- B. Transactions in the stock of a company doing business with the Hospital.
- C. The offer to pay or payment of bribes to secure business.
- D. The use of the Hospital's resources, assets or facilities for political or personal purposes.
- E. Receipt of gratuities, commissions, any compensation, favors, kickbacks, or gifts and/or similar entertainment (of other than nominal value) for granting business.

- F. Ownership or control of twenty-five (25%) percent or more, in any company, partnership, joint venture, consortium, institution or other entity which receives payments for services rendered or products sold to the Hospital.
- G. Any work which creates at least the appearance of a conflict of interest.
- H. Serve as an expert witness in any malpractice case or any other legal proceedings in which the Hospital is a party unless the member of the Medical Staff, Residents, Fellow, Trustees, Officers or Employees is authorized in writing by the Board of Directors.
- I. Any entertainment offered which may place the Trustee, Officer, Medical Staff, Resident, Fellow, or Employee or a member of his or her immediate family or an entity controlled directly or indirectly by any of them in the position of having to return a favor or which may jeopardize the independence necessary for ethical conduct.
- J. Any other relationship or activity which places any Trustee, Officer, Employee, Resident, Fellow and Medical Staff of the Hospital in a position where other than sound ethical business practices or considerations may be used or reasonably inferred.

In accordance with the Hospital's business philosophy, any participation in the above listed activities or relationships must be fully disclosed and reported in writing and approved by two thirds (2/3) of the Board of Trustees. The avoidance of the aforementioned activities is expected from all Trustees, Officers, *Medical Staff, Resident, Fellow, or Employee or a member of his or her immediate family or an entity controlled directly or indirectly by any of them* of the Hospital.

To ascertain compliance, an annual statement to be provided by the Executive Director will be completed and executed by all Trustees, Officers, Employee, Resident, Fellow and Medical Staff senior management and such employees as the Board of Trustees shall designate certifying that

they accept this Conflict of Interest Policy and that compliance with the same is a requisite to maintain any relation with the Hospital. Failure to execute and comply with this Conflict of Interest Policy will be reason for the Hospital to terminate any relation with the member of the Medical Staff, Residents, Fellow, Trustees, Officers or Employees, including, but not limited, the termination of medical privileges. In addition to the annual statement, any participation in the above listed or similar activities shall be timely disclosed in writing to the Board of Trustees through the Executive Director of the Hospital and approved by the Board.

Violation of any of the standards of conduct set forth in this policy may require corrective action of varying severity. Resignation or divestiture may be required if conflicts arise because of investments in other companies. Other activities or relationships may require a letter of reprimand, separation from employment, or termination of medical privileges granted to a member of the Medical Staff. In any situation, the individual merits of disclosure, timeliness, and willingness to cease conflicting actions or potentially conflicting relations, may be extenuating factors that may have a positive impact upon any determination of corrective action.

All contracts in which the Hospital is a party, shall contain, as an exhibit, copy of the conflict of interest policy and compliance with this policy shall be an integral part of the contract.