

Good Samaritan Health & Wellness Center
Policies and Procedures

Subject: Conflict of Interest and Disclosure	Policy #: 3.1
Prepared by:	Revision #:
Approved by: Board of Directors	Effective Date: 08/31/2015

3.1 Conflict of Interest and Disclosure

Good Samaritan Health and Wellness Center rejects favoritism or impropriety in the selection or retention of all vendors and suppliers of goods or services. To support that, all Center Executive Staff and Directors shall submit an annual Conflict and Disclosure of Interest Questionnaire (attached). Within this questionnaire or policy, the following terms are defined as below:

- **Conflict of Interest:** an actual, potential or perceived conflict of interest occurs when an employee or volunteer is influenced to use a particular vendor by accepting money or gifts from that vendor, or where an employee or volunteer encourages his/her organization to use a particular vendor due to a personal or financial relationship that the employee or volunteer has with the vendor.
- **Family:** the spouse (or a parent or sibling thereof) of the employee or volunteer, or a child, grandchild, sibling, or parent of the employee or volunteer (or spouse of any thereof), or an individual having the same home as the employee or volunteer, or a trust or estate of which the employee or volunteer is a beneficiary.
- **Close Friend:** an individual who has a substantial business, personal, or social relationship with an employee or volunteer that is more than a casual acquaintance.

To ensure this policy:

- All employees and volunteers will exercise good faith and caution in all transactions with vendors and suppliers of all types, and will do nothing to jeopardize the reputation, good will, or ethics of the Center. Potential and actual conflict of interest situations must be considered and avoided when necessary.
 - Cash gifts from vendors to individual employees or volunteers in any form are prohibited. Non-cash gift items to an employee or volunteer should be limited to an approximate value of \$50.00 per year per vendor. Provision of items by a vendor to an employee not

related to business or educational purposes (such as entertainment events) should be limited to an approximate value of \$100 per year per vendor. Provision of reasonable meals and/or mileage expense incident to a group business meeting or educational presentation is acceptable as long as the primary purpose of the meeting is for business or educational purposes and substantial business or educational presentations are made. Reimbursement or payment by vendors for reasonable costs associated with necessary business-related travel, meals, lodging, etc., is acceptable, but only to the extent that the time spent is necessary to satisfy the business purpose (i.e., vendor payment or reimbursement of reasonable expenses related to an out of town meeting is acceptable, but vendor payment or reimbursement for expenses when employee chooses to remain at the meeting location after the business purpose of the trip is concluded is unacceptable). Payment or reimbursement by vendors to individual employees or volunteers for non-business related items or services during the legitimate business-meeting period is unacceptable if it exceeds the monetary limitations referenced herein. In all situations where the anticipated amount will clearly exceed, or has clearly exceeded the above-stated limits, the employee's or volunteer's supervisor and the Executive Director shall be consulted for direction.

- Any potential business relationships involving Good Samaritan Health and Wellness Center and vendors or suppliers who employ or associate close friends or family of Center employees or volunteers must be disclosed to and approved by the Center's Executive Director and the Center's Board Chairman prior to entering into any contractual or other business relationship with the Center. Current business relationships involving the Center and vendors or suppliers who employ or associate close friends or family of Center employees or volunteers must be disclosed and may be continued upon approval by the Executive Director and the Board Chairman.
- Any direct or indirect ownership or other financial interest (including any type of employment or independent contractor affiliation relationship) that a Center employee or volunteer has with a Center vendor or supplier must be disclosed to and approved by the Executive Director and the Board Chairman prior to entering into any contractual or other business relationship. Current financial interests or employment relationships as referenced herein between an employee or volunteer and a Center vendor or supplier must be disclosed and may be continued after approval by the Executive Director and the Board Chairman.
- The nature and materiality of the employment relationship or financial-ownership

relationship between the employee or volunteer and the vendor or supplier will be an important factor in considering whether a conflict exists.

- The ability of the employee or volunteer to influence the Center, directly or indirectly, as to the choice of the vendor and/or influence or supervise the relationship with the vendor and the Center will be an important factor in considering whether a conflict exists.
- The Conflict of Interest and Disclosure Questionnaire shall be completed by:
 - Executive Staff and Directors on an annual basis and submitted to the Executive Director by April 1 of each year.
 - Newly appointed Executive Staff and Directors and submitted as part of the application/orientation process.

Violation of this policy may result in disciplinary action.